

Robocall Mitigation Plan
NFON AG

NFON AG (“NFON”) submits the following Robocall Mitigation Plan in compliance with 47 CFR § 64.6305(d)(ii)-(iii) for voice service providers. NFON provides voice calling services in the UK and Europe. It does not offer service in the United States and does not have United States customers; as such, it is not a voice service provider under the TRACED Act or 47 CFR § 64.6305. It does, however, make available US DIDs to its customers where requested for valid purposes; for this reason, it voluntarily submits this Robocall Mitigation Plan to outline the steps it takes to prevent its customers from using resources obtained from NFON in the course of making fraudulent calls into the United States.

Reasonable Steps to Prevent New and Existing Customers from Originating Illegal Calls:

NFON’s terms of service for all customers establish that misuse and illegal use of the service is prohibited; specifically, NFON’s terms prohibit use of its service for unsolicited advertising, as well as for any illegal or immoral purposes. NFON also prohibits the use of its service for machine-to-machine calling; it also disallows its end users from engaging in number spoofing.

Description of Analytics to Block Illegal Traffic:

NFON blocks and monitors extensions, destinations, and costs to prevent call-related fraud. When calls are flagged under these criteria, NFON blocks the extension and contacts the customer to validate that the flagged usage is not prohibited. NFON does not permit its service to be used for machine-to-machine dialing.

Know Your Customer Practices:

NFON requires customers to provide business name, business address, registration ID number, a contact phone number and email, as well as a company seal. NFON also requires documentation of identity such as organizational documents or government-issued identification for individual customers for all new accounts before allocating any US DIDs to any customer.

Other Practices to Prevent Unlawful Calls:

Know Your Upstream Provider Practices:

NFON obtains US DIDs from only two providers - Bandwidth and Sewan (42Com).

Commitment to Respond to Traceback Requests:

NFON is willing and able to cooperate with its upstream providers as needed to ensure their ability to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls. Because NFON does not provide voice service in the United States, it will have no information relevant to a traceback request in the United States.

This Robocall Mitigation Plan describes the specific measures that NFON has implemented to as of [DATE of submission]. NFON continually evaluates the efficacy of its measures to combat bad actors and takes appropriate steps to improve these measures when needed.