

FlashCall LTD

Robocall Mitigation Plan

STIR/SHAKEN Implementation

FlashCall LTD ("FlashCall") is a small voice service provider and is exempt from the requirements of 47 CFR 64.6301 through June 30, 2023, as per 47 CFR 64.6304 — Extension of implementation deadline. Additionally, FlashCall operates as a reseller without direct control over the network infrastructure required to implement STIR/SHAKEN protocols. Despite this, FlashCall collaborates with its wholesalers to ensure call authentication and trustworthiness.

Robocall Mitigation Strategy

FCC Compliance Obligations:

1. Traceback Requests: FlashCall responds promptly to traceback requests from the FCC, law enforcement, or the Industry Traceback Consortium. If the Company has call history access, it provides the necessary information. If not, it coordinates with its underlying carrier to obtain the required data.
2. Illegal Traffic Mitigation: Upon receiving notification from the FCC's enforcement bureau regarding illegal traffic, FlashCall takes immediate and effective action to mitigate such traffic.
3. Preventive Measures: FlashCall implements robust measures to prevent its network from being used for illegal calls by both new and existing customers.

Detailed Steps and Measures:

- Traceback: FlashCall provides call history information to authorities upon subpoena, either directly or through coordination with its carrier partners if direct access is unavailable.
- Illegal Traffic Mitigation: The Company enforces an Acceptable Use Policy within customer agreements to deter spam and fraudulent calls.
- Customer Verification: FlashCall conducts comprehensive checks on its customers, including credit verification and confirmation of legal business name, business structure, federal tax ID, nature of business, primary contact, and service address. This vetting process ensures the legitimacy of customers before they can access services and obtain numbers.
- Carrier Collaboration: FlashCall relies on its carrier partners to notify it of any detected robocalls. In cases of fraudulent activity, FlashCall coordinates with its wholesale service providers to block calls originating from its customers and requests its wholesale carrier to block illegal calls.

Affirmation

FlashCall LTD submits this robocall mitigation plan to comply with the Federal Communications Commission's Fourth Report and Order (FCC 20-187). This plan is dynamic and will be updated as the Company gains more experience and understanding of these protocols.