

Robocall Mitigation Program

Pursuant to 47 C.F.R. § 64.6305, Level Distribution, Inc. and its applicable subsidiaries with FCC Registration Numbers (“FRNs”) (collectively, “Level Telecom”) hereby submits its Robocall Mitigation Program (“RMP”) that reflects Level Telecom’s practices and procedures to prevent and mitigate illegal robocalls. Pursuant to FCC Rule 64.6304(d), 47 C.F.R. § 64.6304(d), Level Telecom is eligible for the extension of implementing STIR/SHAKEN in the non-IP portions of its network. Level Telecom’s RMP provided below describes the specific policy and procedures that Level Telecom has implemented to detect and prevent illegal robocalls on its network.

Level Telecom periodically evaluates the risks it faces, the effectiveness of these policies and procedures, and its capabilities to support the measures described. Should Level Telecom determine that changes or revisions are appropriate, its practices may differ, evolve, and be revised from those described below. In submitting this RMP, Level Telecom reserves the right to modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time in order to respond to changes in its business, its capabilities and its needs.

Commitment:

Level Telecom has taken extensive efforts and is committed to stopping illegal robocallers from routing illegal robocalls calls over Level Telecom’s network.

Voice services and subscribers:

Level Telecom offers, among other things, Voice over Internet Protocol (“VoIP”) and non-IP voice services to retail end user customers and wholesale customers. Level Telecom offers hosted PBX and SIP trunking services to its retail end user customers. For Level Telecom’s hosted PBX services, Level Telecom assigns the end user customer’s service name and number for the caller ID and CNAM (“CallerName”), which end user customers cannot independently change. For its SIP trunking services, Level Telecom’s business end user customers may modify their telephone number appearing on the caller ID for legitimate business needs only, provided that such customers comply with specific company guidelines.

Level Telecom is not an intermediate provider.

Subscriber Vetting:

When signing up new end user customers that will receive retail voice services from Level Telecom over its network, Level Telecom sufficiently vets such customers. For instance, as part of the vetting process, Level Telecom collects information such as physical location, contact person(s), and for businesses, the nature of the customer’s business, among other things. Doing so is necessary to provide a prompt response to traceback requests and enforcement efforts.

Telephone Number Validation:

When Level Telecom establishes service to a retail end user voice customer, Level Telecom confirms the end user customer has a verified association with the telephone numbers it uses for its originating telephone calls.

Acceptable Use Policy:

Level Telecom requires that its customers comply with its Acceptable Use Policy (“AUP”). Under the AUP, Level Telecom may suspend or terminate the services that Level Telecom provisions to a customer (or anyone that uses Level Telecom’s services that are provided to a customer) if such customer violates Level Telecom’s AUP. In most cases, Level Telecom will endeavor to notify the customer of such violations before taking any action, but Level Telecom may act without such notice and without liability to prevent harm or damage to Level Telecom’s, customer’s or a third party’s property, networks or systems. Customers also are required to agree that Level Telecom may amend its AUP from time to time without notice, and that the customer is responsible for compliance with the then current version of the AUP.

Network Monitoring:

Level Telecom has implemented a Fraud and Robocall Monitoring system that analyzes outbound Call Detail Records (“CDRs”) looking for several fraud and robocalling patterns. If the system identifies Robocalling patterns, it will alert Level Telecom’s Robocall mitigation team. The team will review the calls identified as potential robocalls and contact the responsible customers, as applicable. Level Telecom will work with customers to determine the nature of the suspected robocalls. If the calls are determined to be illegal robocalls, Level Telecom’s service to the customer will be suspended or terminated.

Responding to Traceback Requests:

Level Telecom is committed to fully and timely responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and will continue to cooperate with such entities in investigating and stopping illegal robocallers that use Level Telecom’s services to originate robocalls.