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Pursuant to 47 C.F.R. § 64.6305, Zoon Suite S.L. submit this report, as of September 12, 2024, on its plan to prevent and mitigate illegal robocalls. Zoon Suite reserves the right to modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time as it deems appropriate to reflect its business, its capabilities, and its needs.

Company background

Zoon Suite is an incumbent local telephone operator providing voice services to business customers mainly in Spain, although it has customers in some EU countries and Mexico.

Since 2007, Zoon Suite has been offering cloud services that provide telephony solutions to its customers.

Robocall Mitigation Plan

This Robocall Mitigation Plan describes the specific measures that Zoon Suite has implemented to detect and prevent illegal robocalls from originating on its network. Zoon Suite is not a significant source of illegal robocalls at this time and has tailored its robocall mitigation practices to address the area's most at risk of - originating illegal robocalls. The measures described below explain how Zoon Suite mitigates and addresses the risk it experiences. Zoon Suite will periodically evaluate the risks it faces, the effectiveness of its policies and procedures, and its capabilities to support the

measures described. Should it determine that changes are appropriate, its practices may differ from those described below.

Customer Due Diligence

- Zoon Suite conducts a comprehensive due diligence and credit review before establishing a contractual relationship with customers. Zoon Suite's Security Team will review information about new and renewing customers including, but not limited to type of business, state and country of incorporation as contracts are entered into or renewed. The Security Team will identify customers it believes warrant further investigation based on factors that indicate they may be capable of originating illegal robocalls, such as having been subject to a traceback request or previous robocall enforcement action. This review will be aided by external sources and internet searches as are useful in the process. If the investigation raises a concern, the Security Team, in cooperation with Zoon Suite's account team, will discuss the concerns with the customer and take steps to ensure the customer is aware of and will abide by the restrictions. The Security Team will monitor these customers on a "watch list" to determine if additional actions are necessary. Customers who do not engage in problematic practices after a period of time will be removed from the watch list.
- Zoon Suite monitors all of its services for violations of its Acceptable Use Policy, including excessive use.
- Zoon Suite will terminate or suspend service to customers with a history of noncompliance with its contractual obligations, including provisions relating to acceptable use of the service.

Measures to Prevent or Avoid Exchanging Illegal Robocalls

Zoon Suite will prevent the origination of illegal robocalls on its voice network and assist with tracing and stopping illegal robocalls originating on other service providers networks. This is achieved through:

- **Contractual Provisions.** Zoon Suite's tariffs, service agreements, and Acceptable Use Policy prohibit unlawful uses of service and provide for suspension and/or disconnection for violations of these provisions. Subscribers have an obligation not to use the services for any unlawful purpose, not to engage in any fraudulent uses, and to cooperate with Zoon Suite in mitigating unlawful activities. In addition, Zoon Suite's contracts require subscribers to cooperate with the Company to investigate reports of unlawful activity, including cooperating with traceback requests.
- **Robocall Monitoring Procedures.** Zoon Suite uses tools to monitor traffic on its network and identify potentially unlawful call origination. Zoon Suite has

developed a process to investigate incidents identified by this process. The investigation will include determination if the calls are originating on the Zoon Suite network (or, for example, are the result of third parties spoofing numbers associated with Zoon Suite subscribers or have been the subject of previous traceback requests), and will conduct appropriate follow-up with subscribers to remedy any problems or mitigate the situation. If effective action is not taken, Zoon Suite can suspend and/or terminate service to the subscriber.

- **Call Center Solutions.** Zoon Suite offers enterprise level services to call center customers offering inbound and outbound services. Zoon Suite requires its call center customers to adhere to applicable legal requirements, including robocall restrictions. Upon receipt of any claim of violations of the robocalling restrictions, Zoon Suite will address the complaint with the customer and require the customer to take appropriate remedial action if necessary.
- **Preventing Calling Line ID (CLID) “Spoofing.”** Zoon Suite does not enable its customers to “spoof” telephone numbers on the services it provides.
- **Call Blocking.** Zoon Suite currently blocks traffic that appears to be illegal or is flagged as suspicious by its Security Team.

Responding to Traceback Requests

- Zoon Suite has designated an individual as a point of contact for addressing traceback requests.
- **Prompt Investigation and Response.** Upon receiving a traceback request from the Spanish authority, Zoon Suite will endeavor to initiate investigation of the source of suspicious traffic as soon as possible after receiving a traceback request and strive to complete the investigation and response to the request. In the event it Zoon Suite is unable to respond to a traceback request, it will provide sufficient information as to why it is unable to respond.
- **Privacy of Traceback Investigations.** Zoon Suite will not share information about traceback investigations, except with other providers involved in the traceback investigation, or when pursuant to a valid legal process.
- Zoon Suite maintains current and correct information about its upstream carrier customers so that it can provide accurate responses to traceback requests.
- Zoon Suite will periodically review records of traceback requests to identify customers that are the subject of a pattern of traceback inquiries. Zoon Suite will determine an appropriate action to take on a case-specific basis, which may include directing the customer to remedy the problem and, if effective action is not taken, temporary suspension of the customer and/or termination of the customer’s service.

- Zoon Suite maintains records of any traceback request it receives and the customer involved in the request.

Cooperation with State and Federal Regulators

Zoon Suite will cooperate with state and federal regulators to prevent any and all illegal robocalls. Specifically, Zoon Suite will:

- Respond to request for information about illegal robocalls;
- Provide relevant non-proprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities; and
- Implement mandated robocall mitigation procedures to the fullest extent possible with the goal of maximizing the mitigation of illegal robocalls.