

EFROS GROUP LLC Robocall Mitigation Plan

Purpose: The **EFROS GROUP LLC Robocall Mitigation Plan** outlines the specific actions and strategies implemented to prevent, monitor, and mitigate the transmission of illegal or fraudulent robocalls on its network. This plan complies with the FCC's TRACED Act and focuses on enforcing industry standards, such as **STIR/SHAKEN**, to ensure caller ID authentication, prevent spoofing, and block unauthorized calls.

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I. SCREEN

Know Your Customer (KYC) EFROS GROUP LLC conducts thorough KYC activities prior to providing voice services to ensure that customers do not engage in illegal robocall activities.

A. Information Collection:

- EFROS GROUP LLC requires all customers to provide their full legal name, business address, verified email addresses, and phone numbers. Legal entities must also submit the business registration number, state/country of formation, and designated contact persons.

B. Information Validation:

EFROS GROUP LLC verifies customer-provided information through the collection and validation of the following:

1. **Proof of Identity:** A valid government-issued ID for individuals (e.g., passport, driver's license).
2. **Proof of Residence or Business:** Documentation such as utility bills, lease agreements, or business licenses verifying the legal address of the customer or entity.
3. **Proof of Business Legality:** Documentation establishing the existence of the business entity (e.g., articles of incorporation, tax ID).
4. **Proof of Authorized Individual:** Verification that the representative of the business is authorized to act on its behalf.

C. Contractual Provisions:

EFROS GROUP LLC includes terms in service agreements that prohibit the transmission of fraudulent calls. The agreements empower EFROS GROUP LLC to suspend or terminate service for violations, including the transmission of illegal robocalls.

D. Know Your Upstream Provider:

The procurement process requires EFROS GROUP LLC to gather documentation and information from upstream providers, including:

- Business identification and tax details.
- Compliance with laws, including prohibitions on transmitting fraudulent calls.

II. MONITOR

Monitoring Traffic Patterns

A. Traffic Patterns:

EFROS GROUP LLC continuously monitors the traffic patterns of its customers to detect abnormal

behaviors indicative of fraudulent or illegal robocalls, including:

1. **Short Call Durations:** Calls lasting less than 6 seconds.
2. **High Call Volumes:** Repeated calls within short intervals from a single customer.
3. **Call Answer Rates:** Anomalously low answer rates.
4. **High-Risk Destinations:** Calls to destinations known for high levels of fraud.
5. **Dialing Patterns:** Suspicious dialing behavior inconsistent with legitimate usage.
6. **Do-Not-Call Lists:** Calls made to numbers listed on DNC registries.
7. **Traceback Requests:** Response to industry traceback requests to identify and stop illegal calls.
8. **Traffic Behavior Changes:** Sudden changes in traffic volume or call patterns that may indicate fraudulent activity.

B. Spam Labeling:

EFROS GROUP LLC uses third-party tools to label calls as spam based on call behavior, analytics, and data provided by industry experts. Calls identified as potential spam will have a warning label applied to their CNAM (Caller ID Name).

III. MITIGATE

A. Response to Traceback Requests:

EFROS GROUP LLC commits to responding to traceback requests from the FCC, law enforcement, and industry traceback consortia within 24 hours. We cooperate fully in investigations of illegal robocalls.

B. Robocall Mitigation Database Filings:

EFROS GROUP LLC only accepts calls from domestic and foreign providers that are listed in the FCC's Robocall Mitigation Database. Providers that are de-listed or have not filed compliance reports are rejected.

C. Blocking and Discontinuation of Fraudulent Traffic:

When fraudulent traffic is detected, EFROS GROUP LLC's dedicated fraud prevention team immediately takes action to block the suspicious traffic. In addition, services for the customer transmitting fraudulent traffic may be suspended or terminated.

D. Selective Call Blocking:

EFROS GROUP LLC employs selective call blocking mechanisms that reject calls based on their risk profile. This includes the validation status of the calls under the **STIR/SHAKEN** framework and Telephone Number (TN) validation. Calls that fail STIR/SHAKEN verification or originate from known fraud numbers are blocked or flagged for further action.

Continuous Evaluation:

EFROS GROUP LLC evaluates its Robocall Mitigation Plan regularly to ensure the effectiveness of its measures against robocalls. The plan is updated to reflect changes in regulatory requirements, emerging fraud patterns, and advancements in call authentication technology.

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