

INTELEPEER NETWORKS LLC (“INTELEPEER”)
FCC ROBOCALL MITIGATION PLAN

Business name and primary address:

IntelPeer Networks LLC
18 Shrewsbury Drive
Rumson, NJ 07760

Other business names and names previously used: Esplicity Communications LLC.

IntelPeer is not a foreign voice service provider.

Name, title, department, business address, telephone number, and email address of one person within the company responsible for addressing robocall mitigation-related issues:

Francis Lauria
Managing Member
IntelPeer Networks LLC
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IntelPeer is a non-interconnected voice over Internet Protocol (“VoIP”) provider reselling the voice services of IntelPeer Cloud Communications LLC (an unaffiliated company) (“ICC”). IntelPeer provides voice services to its customers by reselling the upstream inbound or outbound calling services of ICC. IntelPeer does not own any facilities used for voice services.

IntelPeer is not currently fully compliant with STIR/SHAKEN authentication program. However, it falls within the exemption of the full STIR/SHAKEN authentication rules of the Federal Communications Commission (“FCC”), codified at 47 C.F.R. §§ 64.6304(b), 64.6305(d)(2)(i). Specifically, IntelPeer lacks control over the network infrastructure of ICC.

IntelPeer complies with the following robocall mitigation program for its VoIP service:

- Know Your Customer: Prospective new voice service customers will speak with an IntelPeer representative to order voice services; there will be no mechanism allowing voice service initiation without that person-to-person contact. IntelPeer will obtain the name and physical location of each voice customer prior to initiating service. IntelPeer will know its customers and, to the best of its knowledge, will provide VoIP service to customers that are legitimate businesses which do not engage in robocalling or any other form of illegal calling. IntelPeer will rely on ICC’s extensive prevention, monitoring, and mitigation procedures and practices to further mitigate the risks of illegal robocalling.

See ICC Robocall Mitigation Plan at:

https://fccprod.servicenowservices.com/rmd?id=rmd_form&table=x_g_fmc_rmd_robotcall_mitigation_database&sys_id=90d8fbf51b8df4109294113d9c4bcbb9&view=sp.

Where ICC utilizes any third-party analytics vendors, it does implement several strategies to monitor its network for suspicious number usage. *Id.*, at 2-3.

- IntelPeer has a Fair Use Policy for outbound VoIP service, which is included in all customer contracts, stating that all calls must be placed via direct human interaction. IntelPeer prohibits any use of the service to: (i) connect to any device, computer or telephone system, which can either (a) place calls in an automated fashion (such as any predictive dialer, auto-dialer or robodialer), or (b) make routing choices based on the cost of a call (such as a least cost routing engine); or (ii) engage in traffic patterns which fail to conform on a monthly average basis with a natural distribution across RBOC, ILEC, CLEC and wireless destinations.
- Know Your Upstream Provider: IntelPeer customers connect to the Public Switched Telephone Network through ICC. According to the FCC's Robocall Mitigation Database, ICC is fully compliant with STIR/SHAKEN. See https://fccprod.servicenowservices.com/rmd?id=rmd_form&table=x_g_fmc_rmd_robotcall_mitigation_database&sys_id=90d8fbf51b8df4109294113d9c4bcbb9&view=sp.
- IntelPeer's VoIP customers can only use ported telephone numbers or telephone obtained from IntelPeer to originate or terminate voice calls.
- IntelPeer shall respond fully within 24 hours to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

No prior IntelPeer robocall certification has been removed by FCC action and it has not been prohibited from filing in the Robocall Mitigation Database.

At no time in the prior two years has IntelPeer been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to IntelPeer transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing or a deficient Robocall Mitigation Database certification or mitigation program description.

Respectfully Submitted,

/s/

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