

VoIPxDialer LLC Robocall Mitigation Plan

Effective Date: October 2024

I. Objective and Scope

The primary objective of VoIPxDialer LLC's Robocall Mitigation Plan is to prevent the origination of illegal robocalls on our network while complying with all regulatory requirements set forth by the Federal Communications Commission (FCC). Our comprehensive plan is designed to ensure the proper use of our services, detect suspicious traffic, and cooperate with law enforcement and industry organizations to trace and eliminate illegal robocall activities.

This plan applies to VoIPxDialer LLC in all roles: as an originating provider, intermediate provider, and gateway provider.

II. Robocall Mitigation Procedures for Originating Providers

A. Use Policy (Website Terms & Conditions)

VoIPxDialer LLC has a clear Acceptable Use Policy and Anti-Fraud Policy available on our website. These policies inform customers of prohibited activities such as:

- Using services for fraudulent purposes.
- Reselling or rebilling our services.
- Using auto-dialers or engaging in robocall campaigns without authorization.
- Violating federal or state laws, including spoofing caller IDs.

VoIPxDialer LLC reserves the right to suspend or terminate services that violate these policies.

B. Know Your Customer (KYC) Protocols

VoIPxDialer LLC implements stringent Know Your Customer (KYC) procedures to verify the identities of all new subscribers:

- **Individual Customers:** We require valid identification (e.g., driver's license, passport) along with proof of address (e.g., utility bill or lease agreement) to verify identity.
- **Business Customers:** We require business documentation (e.g., certificate of incorporation, tax ID) and perform additional due diligence such as verifying the company's physical address and business website.

C. Contractual Terms

VoIPxDialer LLC's contracts include terms that prohibit illegal activities, including spoofing, and fraudulent or abusive use of the service. We also enforce strict payment methods through verifiable means and reserve the right to suspend services if terms are violated.

III. Robocall Mitigation Procedures for Intermediate Providers

VoIPxDialer LLC requires all upstream providers to undergo a thorough vetting process before we exchange voice traffic. Our contracts include provisions that ensure:

- Cooperation in fraud prevention.
- Data sharing for law enforcement investigations.
- Adherence to FCC requirements and industry best practices.
- Audit rights to review call detail records for suspicious traffic.

IV. Robocall Mitigation Procedures for Gateway Providers

VoIPxDialer LLC applies the same vetting, monitoring, and contractual procedures to gateway providers as we do for intermediate providers. Our agreements include robust provisions to ensure full cooperation in preventing illegal robocalls from being transmitted or originated through our network.

V. General Robocall Mitigation Procedures

A. Traffic Monitoring

VoIPxDialer LLC's Network Operations Center (NOC) continuously monitors traffic for signs of robocall activity. Our system detects patterns such as:

- High call volumes with short durations.
- Spoofed or fraudulent numbers.
- Low termination rates indicating potential robocalls.

We also use third-party tools to analyze traffic patterns and block suspicious calls in real-time.

B. Investigating Suspicious Traffic

When suspicious traffic is identified, our fraud management team investigates immediately. Alerts generated by our monitoring systems are analyzed, and if fraudulent activities are confirmed, we suspend the customer's services.

VoIPxDialer LLC actively participates in industry traceback efforts, cooperating with the Industry Traceback Group (ITG) and law enforcement agencies to trace and mitigate illegal traffic.

C. Suspension of Illegal Traffic

VoIPxDialer LLC enforces strict policies to suspend services immediately once suspicious traffic is verified. This helps prevent further illegal robocall activities while allowing us to comply with legal and regulatory requirements.

D. Industry Participation and Collaboration

VoIPxDialer LLC is a member of fraud prevention organizations and collaborates with other industry players to share best practices for combating illegal robocalls. We work closely with organizations such as the ITG and follow industry guidelines to prevent and mitigate fraudulent traffic.

VI. Certifications

- VoIPxDialer LLC is registered with the Robocall Mitigation Database.
- We respond to traceback requests from the FCC, law enforcement, and industry organizations within 24 hours.
- VoIPxDialer LLC has not been subject to any investigation or enforcement action related to illegal robocall activities.

VII. Conclusion

VoIPxDialer LLC is fully committed to preventing illegal robocalls from originating or passing through our network. By implementing this Robocall Mitigation Plan, we ensure compliance with all regulatory requirements and contribute to industry efforts to protect consumers from fraudulent robocalls.

This version reflects the policies and practices of **VoIPxDialer LLC** and is structured to align with regulatory standards while addressing the specifics of robocall mitigation. Let me know if any further modifications are needed!