

BPONovo (voice service provider)

As a small call center service provider, we do not have direct control over the network infrastructure necessary to implement the STIR/SHAKEN framework. Our services rely on third-party telecommunications providers (such as Twilio) to support our network connections and call transmission. Due to the lack of direct control over these external network components, we are unable to independently implement STIR/SHAKEN. Therefore, we currently depend on our service providers to ensure network security and compliance, and to implement any required robocall mitigation measures according to regulatory requirements.

As part of our robocall mitigation program, we have implemented several reasonable steps to avoid originating illegal robocall traffic. We maintain an internal IT team responsible for monitoring and managing our network traffic. This team conducts regular audits and utilizes tools, including Superset BI, to monitor call traffic patterns and identify any unusual or suspicious activity that may indicate illegal robocalls.

To comply with our obligation to know our customers under § 64.1200(n)(4), we perform due diligence on new clients before onboarding, verifying their identity and business purpose to prevent misuse of our services. Additionally, we have established procedures to vet and understand our upstream providers to ensure they align with our compliance and security standards.

We use analytics systems to assess and flag any traffic anomalies that may suggest illegal activity, and we work with third-party analytics vendors when necessary to strengthen our traffic monitoring and blocking capabilities. By implementing these measures, we aim to mitigate the risk of illegal robocalls originating from our network.

We are committed to responding promptly to all traceback requests from the Commission, law enforcement agencies, and the industry traceback consortium within 24 hours. Our team is dedicated to cooperating fully with these entities to investigate and halt any illegal robocalling activity originating through our services. We prioritize compliance and actively work to prevent our network from being used for unlawful purposes, taking all necessary steps to support regulatory efforts in stopping illegal robocallers.

In the past two years, neither the filing entity nor any entity with shared ownership, management, directors, or control has been the subject of any formal action or investigation by the Commission, law enforcement, or any regulatory agency related to allegations of transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing. Additionally, there have been no findings of deficiencies in our Robocall Mitigation Database certification or mitigation program description. We remain fully compliant with all regulatory requirements and committed to upholding the highest standards of integrity in preventing illegal robocall activities.

I declare (or certify, verify, or state) under penalty of perjury that the foregoing is true and correct. Executed on 11-14-2024.

Duo Xu



CTO

11-14-2024