



**Boom
Communications,
Inc.**

1106 Colorado
Blvd.,
Los Angeles CA
90041

833-266-6338

info@boomcommunications.net
boomcommunications.net

Robocall Mitigation Plan

Boom Communications, Inc.
Headquarters: 1106 Colorado Blvd., Los Angeles, CA 90041

Preventative Measures

We perform the following roles in the call chain:

- A voice service provider with a STIR/SHAKEN implementation obligation serving end-users
- A voice service provider with a STIR/SHAKEN obligation acting as a wholesale provider originating calls

Boom Communications, Inc. has not been prohibited from filing a certification in the Robocall Mitigation Database.

Boom Communications, Inc. does not have a history of enforcement actions for illegal robocalls, TCPA or TSR violations, or related state law violations.

Boom Communications, Inc. uses the following affirmative, effective measures to prevent the origination or transit of illegal robocalls.

Caller Identification

We follow caller ID authentication best practices for vetting caller identity and operational legitimacy for new and existing customers as described by the NANC Call Authentication Trust Anchor Working Group, including:

- Checking robocalls, unallocated calls, and invalid numbers against a pre-existing "Do Not Originate" list
- Using reputation scoring (e.g., caller ID analysis/lookup) to determine whether a call likely was executed with malicious intent
- Employing block lists and dynamic traffic analysis

This process includes the collection and review of entity-identifying information to confirm that we have an authenticated relationship with the customer. We use this authenticated information to determine whether the customer is subject to any enforcement actions that restrict the type of calling they may do, such as bans on initiating telemarketing calls.

We also validate, when possible, that the entity has a legitimate right to use its asserted calling numbers. This information supports the attestation level we assign to calls that we originate for that customer.

Our contractual provisions and acceptable use policy with customers prohibit them from initiating illegal robocalls. If we detect a customer initiating suspicious robocalls, we warn them to stop. If such traffic continues, we reserve the right to terminate or suspend their service, while retaining all rights and remedies, including injunctive (restraining) relief.

Upstream Providers

We have a vetting and review process for upstream providers—those that send us voice traffic that we terminate or transit to other providers.

Boom Communications Utilizes Bulk Solutions and other for its STI-AS and STI-VS services

Boom Communications also utilizes Commio and Bulk Solutions robocall mitigation services. This service scans all TNs coming in, labels them appropriately, and blocks the ones that have a known history of fraudulent activity.

Boom Communications has implemented a robocall mitigation program by sending valid CallerID in the SIP From Header and/or the P-Asserted Identity header of every SIP INVITE message that originates from its network. Boom Communications is in full control of all CallerID assignments and does not allow a call to originate without a valid CallerID. These messages are sent to Boom Communications' upstream trunk carriers:

- Telnyx LLC
- Bandwidth Inc.
- Bulk Solutions LLC.
- Commio Inc.

- We confirm that the upstream provider has a certification in the Robocall Mitigation Database. We will not accept voice traffic from an unregistered provider.
- We require that upstream providers have a reasonable robocall mitigation plan, including a vetting process for their customers and upstream providers, and use call analytics to identify suspicious traffic.
- We establish an understanding of the upstream provider's role in the call path for the traffic they will send to us, such as whether they are acting as an originating voice service provider, a foreign intermediate provider, or a U.S.-based intermediate provider. This information is used to understand whether we will be obligated to authenticate unsigned traffic that we receive from them.

Our contractual provisions and acceptable use policy with upstream providers are designed to prohibit them from sending illegal robocalls through our network.