

Robocall Mitigation Plan

For Compliance with 47 CFR § 64.6305

1. Introduction

This Robocall Mitigation Plan is submitted in compliance with the requirements of 47 CFR § 64.6305, specifically addressing the obligations of voice service providers, gateway providers, and non-gateway intermediate providers. The plan outlines our proactive measures to prevent the origination and transmission of illegal robocalls across our network.

2. Provider Information

- **Company Name:** Holvox Carrier Services LLC
- **FCC Registration Number (FRN):** 0036705895
- **Role in the Call Chain:** Voice Service Provider / Gateway Provider
- **Primary Contact for Robocall Mitigation:**
 - Name: David Ogundana
 - Title: Mr.
 - Email: support@holvox.com
 - Phone: 281 404 1134

3. Robocall Mitigation Practices Implemented

A. Customer Verification and KYC (Know Your Customer) Procedures

To ensure that only legitimate customers access our services, we have implemented stringent KYC procedures:

- Verification of customer identity through official documentation.
- Screening of customers against known robocall offenders.
- Periodic reviews of customer call traffic patterns to detect suspicious activity.

B. Caller ID Authentication Using P-Asserted Identity

To prevent call spoofing and ensure the authenticity of caller information, we have enforced the use of **P-Asserted Identity (PAI)**:

- Ensuring that all outbound calls contain accurate and verifiable CLI (Calling Line Identification).
- Blocking calls that contain missing or invalid caller ID information.
- Implementing policies to reject or flag calls that attempt to manipulate CLI.

C. Traffic Monitoring and Call Analytics

We continuously monitor network traffic for patterns indicative of illegal robocalls:

- Deploying automated analytics tools to identify high-volume short-duration calls.
- Implementing machine learning-based anomaly detection to flag suspicious traffic.
- Maintaining a dedicated compliance team to review flagged calls and take action.

D. Call Blocking and Mitigation Measures

- Implementing network-based blocking of calls originating from known robocallers.
- Participating in industry-wide traceback efforts to identify the source of illegal calls.
- Coordinating with upstream and downstream providers to prevent transmission of robocalls.

E. STIR/SHAKEN Compliance

- If applicable, full implementation of STIR/SHAKEN on SIP calls to authenticate caller identity.
- Where STIR/SHAKEN is not feasible, alternative robocall mitigation measures are applied.

F. Cooperation with Enforcement and Regulatory Bodies

- Immediate response to traceback requests from the Industry Traceback Group (ITG) and regulatory authorities.
- Periodic submission of compliance reports to the FCC.
- Timely notification of any changes to our robocall mitigation practices.

4. Compliance Monitoring and Reporting

We have established an internal compliance monitoring program that includes:

- Regular audits of call records to ensure adherence to mitigation policies.
- Reporting mechanisms for customers and stakeholders to flag suspicious calls.
- Continuous updates to our robocall mitigation strategies based on emerging threats and regulatory updates.

5. Certification and Filing

In accordance with 47 CFR § 64.6305, we certify that we have implemented this Robocall Mitigation Plan and are actively preventing the origination and transmission of illegal robocalls. This plan has been filed with the FCC's Robocall Mitigation Database as required.

6. Contact Information for Reporting and Compliance

For inquiries related to this Robocall Mitigation Plan, please contact:

- **Compliance Officer:** David Ogundana
- **Email:** support@holvox.com
- **Phone:** 281-404-1134

This document serves as our commitment to reducing illegal robocalls and ensuring compliance with FCC regulations. We will continue to enhance our mitigation efforts to align with industry best practices and evolving regulatory requirements.