



Robocall Mitigation Plan

STIR-SHAKEN

PhoneFusion is a value-added outbound VoIP provider. Calls that originate from its network are subject to its own mitigation program (see below) as well as those mitigation programs (including Stir-Shaken) in place by its inbound providers. Once tested and approved, we will fully implement Stir-Shaken on all originating calls consistent with 47 CFR § 64.6305(a)

Know Your Customer

All customers contractually agree to various terms and conditions, including a commitment to comply with PhoneFusion's Terms of Use. These terms prohibit:

- Using any PhoneFusion services to engage in any activities that are illegal, abusive, false, fraudulent, deceptive, misleading, or fail to comply with the Truth in Caller ID Act.
- Using any PhoneFusion services to engage in any activities that exploits, harms, or threatens to harm children.
- Engaging in any unsolicited advertising, marketing, or other unlawful activities using services that violate laws applicable to advertising, electronic communications, and telemarketing, including, but not limited to, the Telephone Consumer Protection Act, the Telemarketing Consumer Fraud and Abuse Prevention Act, FCC regulations and orders implementing the TCPA, and all federal and state Do Not Call and calling-time restriction laws and regulations.
- Using PhoneFusion services in any way that fails to conform to any applicable industry guidelines and standards, including, without limitation, the CTIA Messaging Principles and Best Practices.

SIP Configuration

PhoneFusion customers have no access or control of Caller ID. We only permit genuine Caller ID for call origination.

Network Monitoring

PhoneFusion continuously monitors its networks for mass calling events to address and mitigate outbound fraudulent calling. If a calling pattern consistent with illegal robocalls is detected, we will identify the party placing such traffic and take appropriate action.

Commitment to Traceback Cooperation

PhoneFusion continues to take all such reasonable steps to avoid originating illegal robocall traffic and shall include a commitment to respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry consortium, and to cooperate with such entities investigating and stopping any illegal robocallers using its service to originate calls.