



ROBOCALL MITIGATION PLAN

June 30, 2025

Orion Networks, LLC DBA Call-Path and Family Phone Effective Date: July 2025

This Robocall Mitigation Plan is submitted by Orion Networks, LLC, operating under the trade names Call-Path and Family Phone ("Orion Networks"), pursuant to 47 C.F.R. § 64.6305, adopted by the Federal Communications Commission (FCC), which requires all voice service providers to establish a robocall mitigation plan. This document outlines Orion Networks' policies and procedures designed to reduce or eliminate outbound illegal robocalls originating on its network. These measures constitute "reasonable steps" to prevent illegal robocall traffic, and Orion Networks commits to responding to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG), and to cooperating fully in investigating and stopping any illegal robocalls that may use its service to originate calls.

I. STIR/SHAKEN Implementation Status

As indicated in the FCC Robocall Mitigation Database, Orion Networks' status with respect to STIR/SHAKEN implementation is Option 3: No STIR/SHAKEN Implementation – Performing Robocall Mitigation. Orion Networks relies on the continuing extension from STIR/SHAKEN implementation provided under 47 CFR § 64.6304(d), as it does not own or control the network infrastructure necessary to implement STIR/SHAKEN Caller ID Authentication. [REDACTED] Orion Networks has established the policies and procedures outlined in this plan to prevent anyone from using our services to originate illegal robocalls.

II. Traceback Requests

Orion Networks is committed to cooperating with the FCC, law enforcement, and the ITG on all traceback requests and investigations. We dedicate sufficient resources to provide prompt and comprehensive responses to traceback requests, committing to fully respond within 24 hours of receipt. Appendix A identifies a single point of contact for receiving and managing all traceback requests. Additionally, Orion Networks includes provisions in its carrier interconnection and service agreements requiring traceback cooperation, specifying that parties must promptly identify the upstream provider or customer from which a suspected illegal robocall originated.

III. Customer Vetting Practices

To prevent illegal robocalls, Orion Networks employs rigorous customer vetting practices for all subscribers, including retail, business, and commercial customers. We collect detailed information, such as physical location, contact personnel, state or country of incorporation, federal tax ID (or equivalent non-U.S. identifier), and the nature of the customer's business. This vetting occurs during service provisioning, agreement execution, and telephone number assignment. Commercial customers with complex service configurations, which may pose a higher risk of illegal robocalling, are subject to additional scrutiny, including background checks and, at our discretion, on-site visits. Our service agreements and Acceptable Use Policies (AUPs) prohibit using our services for illegal activities, including robocalling, and reserve the right to suspend or terminate services for violations.

IV. Telephone Number Validation

Orion Networks validates the right of customers to use telephone numbers associated with their VoIP services. Subscribers may only use numbers directly managed by Orion Networks or obtained through our upstream provider partnerships. For single-line and multi-line subscribers (connected via TDM or IP), our switching equipment is configured to accept calls only from assigned numbers, and we screen originating calls to ensure the caller ID matches an authorized number. These automated screening capabilities provide a secure method to validate telephone numbers and prevent unauthorized use.

V. International Call Originators

Orion Networks does not currently serve international call originators using North American Numbering Plan (NANP) resources. Should we onboard such customers in the future, we will implement best practices for vetting their identities and validating telephone numbers for all internationally originated calls, ensuring compliance with this Robocall Mitigation Plan and FCC regulations.

VI. Know Your Upstream Provider Procedures

As a provider of VoIP services, Orion Networks maintains close relationships with a limited number of upstream providers to route and terminate originated calls. We ensure awareness of their business operations and the legitimacy of their call transmission services through ongoing communication and contractual agreements. These relationships enable us to maintain high-quality services while mitigating the risk of illegal robocall traffic entering our network.

VII. Ongoing Robocall Mitigation Practices

Orion Networks, through its upstream provider partnerships, monitors network usage and call detail records (CDRs) on a recurring basis to detect suspicious call patterns indicative of illegal robocalling. Specific patterns monitored include: (1) high-volume traffic bursts in short timeframes or inconsistent usage spikes; (2) short-duration calls with low completion rates; (3) sequential dialing patterns; (4) repeated Ang calls to do-not-call registry or invalid numbers; and (5) calls to unassigned NPA-NXX codes. When suspicious activity is detected, Orion Networks contacts the customer within 24 hours for investigation and, if necessary,

takes action such as initiating a traceback, verifying caller ID authorization, or terminating the customer's ability to originate calls. We also notify law enforcement authorities as needed.

VIII. Third-Party Call Analytics

Orion Networks leverages monitoring and analytics tools through its upstream provider partnerships to identify and block illegal robocall traffic. These tools, described in Appendix A, enhance our ability to detect and mitigate suspicious call patterns, ensuring robust protection against illegal robocalls.

IX. Additional Certification-Related Information

Orion Networks certifies that, in the prior two years, it has not been subject to formal FCC, law enforcement, or regulatory agency actions or investigations with findings of actual or suspected wrongdoing related to illegal robocalls, spoofing, or deficient Robocall Mitigation Database certifications. We further certify that we have not been prohibited by the FCC from filing in the Robocall Mitigation Database and that none of our prior certifications have been removed by Commission action.

Appendix A

Traceback Request Single Point of Contact:

Name: Michael Morrison

Title: General Manager

Phone Number: 703 752-1999

Email Address: michael@orion-networks.net