



Robocall Mitigation Plan

(for Network Intelligence – FCC FRN 0037393857)

1. Company Information

Entity Name: Network Intelligence

FRN: 0037393857

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2. Overview of Robocall Mitigation Commitment

Network Intelligence is committed to preventing illegal robocalls from originating or transiting our network. We actively monitor traffic, vet customers, participate in traceback efforts, and use call authentication technologies to the extent feasible.

3. STIR/SHAKEN Status

Implementation Status: [Select one: Not Implemented – but with mitigation measures in place]

For authenticated IP-based traffic, STIR/SHAKEN is applied in compliance with FCC rules.

For non-IP traffic, equivalent mitigation measures are in place as described below.

4. Customer Vetting Plan

Objective:

To prevent misuse of our network for illegal robocalls by ensuring that new and existing customers are legitimate and accountable.

1. Identity Verification & Documentation

Before onboarding, we require each customer to submit the following:

- Legal business name, entity type, and state/country of incorporation.
- Federal Tax ID or Employer Identification Number (EIN).
- Physical address of business operations and billing location.
- Contact person for robocall-related issues (name, title, phone, email).
- Brief description of intended service use, including expected call volumes and dialing methods.

2. Right to Use Telephone Numbers

- Customers must provide documentation confirming lawful use of any telephone numbers they present.
- Verification is conducted via internal review or third-party validation.



3. Risk Assessment & Underwriting

- Onboarding risk assessment based on customer type, expected behavior, and history.
- High-risk profiles undergo heightened scrutiny.

4. Ongoing Monitoring & Alerts

- Active monitoring of call patterns for anomalies.
- Suspicious patterns trigger review and potential suspension.

5. Contractual Responsibilities

- Customers certify compliance with laws and consent rules.
- Cooperation required for FCC or law enforcement investigations.

6. Escalation & Termination Procedures

- Suspension or termination for misuse or non-compliance.
- Cooperation with traceback investigations is mandatory.

7. Documentation Retention

- Records retained for at least 24 months and made available for audit.

5. Traffic Monitoring & Analytics

We continuously analyze call patterns using automated systems that flag:

- High-volume short-duration calls
- Calls to high-risk destinations
- Unusual calling hours

Alerts trigger manual review by compliance staff within one business day.

6. Traceback Cooperation

We respond to traceback requests from the Industry Traceback Group (ITG) and other lawful entities within 24 hours. Internal logs enable identification of call sources and customer assignments.

7. Call Authentication & Number Validation

All assigned numbers are verified for proper customer ownership before activation.

Calls are signed with STIR/SHAKEN attestation when feasible:

- A Attestation – Customer and number verified.
- B/C Attestation – Partial verification.

8. Complaint Handling

A dedicated compliance email (e.g., compliance@netg2.com) is maintained for complaints. Complaints are logged, investigated within 48 hours, and remedial action is taken as needed.



9. Enforcement & Remediation

Violations of terms or FCC robocall rules may result in:

- Immediate suspension of service
- Termination of accounts
- Notification to FCC or authorities

Enforcement records retained for at least 24 months.

10. Record Retention

Maintain onboarding and monitoring records for a minimum of 24 months.

All records stored securely with restricted access.

11. Officer Certification

I, James Y. Hash, certify under penalty of perjury that this Robocall Mitigation Plan is accurate, and that Network Intelligence is implementing these measures in full compliance with FCC rules.

Signature:

A handwritten signature in black ink, appearing to read 'James Y. Hash', written over a horizontal line.

Date:

08/14/2025