

NoxxServices LLC – ROBOCALL MITIGATION PLAN

1. **General Commitment** NoxxServices LLC is fully committed to preventing its network from being used to originate, transit, or facilitate illegal or unwanted robocalls. NoxxServices LLC actively participates in industry efforts by cooperating fully and promptly with the US Telecom Industry Traceback Group (ITG) and by implementing robust, multi-layered processes to block illegal traffic at every stage.

2. Reasonable Steps to Prevent Customers from Originating Illegal Robocalls

A. **Strict Contractual Prohibitions** NoxxServices' Master Services Agreement (MSA) and Acceptable Use Policy (AUP) explicitly prohibit:

- Use of the service for illegal robocalling, autodialing without consent, or caller-ID spoofing in violation of the TCPA, TRACED Act, or Truth in Caller ID Act
- Use of third-party software or systems to automate calling or messaging in violation of law Violation of these terms results in immediate suspension or permanent termination of service.

B. **Comprehensive Know-Your-Customer (KYC) Process (Proactive)** All prospective customers (direct and downstream/resellers) must complete a rigorous KYC process before any traffic is accepted:

1. Business entity name, principal place of business, EIN, FCC Form 499 Filer ID (if applicable), Robocall Mitigation Database ID
2. National Do-Not-Call Registry account numbers
3. Full name, title, date of birth, and government-issued photo ID of all principals/officers with $\geq 10\%$ ownership or control
4. Recent bank statement and utility bill for address verification
5. Certificate of incorporation/organization and customer's own robocall mitigation plan
6. Signed attestation of TCPA/TRACED Act compliance and commitment to scrub against the National DNC Registry

All submitted information and documents are verified through reputable third-party providers. Background checks are performed on principals to confirm no prior convictions for fraud, theft, dishonesty, or telecommunications-related regulatory enforcement actions.

C. **Know-Your-Upstream-Provider Practices** NoxxServices conducts due diligence on all upstream carriers and requires contractual provisions that:

- Prohibit acceptance of illegal traffic
- Mandate full cooperation on traceback and mitigation
- Allow immediate cessation of traffic upon evidence of illegal robocalling

D. **Real-Time Traffic Monitoring & Analytics** NoxxServices deploys internal and third-party systems that continuously monitor for illegal patterns, including but not limited to:

- High call completion rates with short duration
- Sequential or algorithmic dialing
- Excessive concurrent calls from a single customer
- Invalid, unallocated, or high-risk ANIs
- Spoofed or mismatched caller ID
- Unusual geographic or time-of-day patterns

Flagged traffic triggers automatic rate-limiting, CAPTCHA challenges, temporary blocks, or permanent termination.

E. **Technical Blocking Measures**

- Automatic blocking of invalid/spoofed ANIs and invalid outbound termination destinations
- STIR/SHAKEN implementation with rejection or downgrade of unsigned or lowattestation
- calls from high-risk sources
- Daily spam/spoofing reports with immediate blocking of offending ANIs
- Dynamic behavioral blocking and honeypot monitoring

F. **Zero-Tolerance Enforcement** Any customer associated with:

- More than two (2) valid traceback requests in any 30-day period, or
- Confirmed illegal robocalling activity will have all traffic immediately and permanently blocked.

3. **Commitment to Traceback Cooperation** NoxxServices is a registered participant in the USTelecom Industry Traceback Group (ITG). We respond fully and accurately to all traceback requests from the ITG, law enforcement, or the FCC within 24 hours and cooperate completely in investigating and stopping illegal callers.

4. Ongoing Enhancement & Oversight

- Regular internal audits of customer traffic and compliance processes
- Continuous staff training on the latest robocall threats and mitigation techniques
- Proactive customer education on legal obligations
- Periodic review and strengthening of this plan as threats evolve

Certification NoxxServices LLC certifies that the measures described above are fully implemented across our network and are effective in preventing the origination or transmission of illegal robocalls.

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