

Robocall Mitigation Program Description

Point North Networks, Inc. – VoIP Services

1. Company Overview

Point North Networks, Inc. provides interconnected Voice over IP (VoIP) services to business and residential customers. As a responsible telecommunications provider, Point North Networks is committed to protecting the integrity of the U.S. communications network and preventing the origination of illegal or fraudulent robocalls through our network.

2. STIR/SHAKEN Implementation

Point North Networks has implemented the STIR/SHAKEN call authentication framework in its IP-based network where technically feasible. Calls originating on our VoIP platform are authenticated and signed to the maximum extent possible. For traffic that cannot be signed (e.g., non-IP interconnections or legacy handoffs), additional robocall mitigation measures are applied, as outlined below.

3. Robocall Mitigation Practices

For all originating traffic, Point North Networks employs a multi-layered robocall mitigation program that includes:

- Know Your Customer (KYC) Procedures
 - Verification of customer identity and business legitimacy prior to activation.
 - Collection of responsible party contact information for every customer account.
 - Ongoing account monitoring and review to ensure compliance.
- Traffic Monitoring and Analytics
 - Automated monitoring systems to detect high-risk call patterns, such as excessive short-duration calls, high-volume spikes, or calls to invalid numbering ranges.
 - Real-time and retrospective analysis of call traffic to identify suspicious activity.
 - Implementation of thresholds and alerts that trigger immediate investigation.
- Call Blocking and Remediation
 - Blocking of calls from invalid, unallocated, or spoofed numbers.
 - Suspension or termination of accounts engaged in illegal or fraudulent robocall activity.



- Coordination with industry traceback efforts led by the USTelecom Industry Traceback Group (ITG).
- Customer and Partner Education
 - Informing customers of compliance obligations and the prohibition on use of our network for illegal robocalling.
 - Requiring contractual agreements that prohibit the origination of unlawful robocalls.

4. Traceback Cooperation

Point North Networks fully cooperates with the USTelecom Industry Traceback Group (ITG) and responds to traceback requests in a timely and comprehensive manner to identify and address sources of suspicious robocall activity.

5. Enforcement and Accountability

- Any customer found to be in violation of federal or state robocall regulations will have service immediately suspended and may be permanently terminated.
- Violations are documented and reported as required to the FCC or other enforcement authorities.
- Point North Networks maintains a designated compliance officer responsible for oversight of our robocall mitigation program.

6. Compliance Certification

Point North Networks certifies that it has implemented the STIR/SHAKEN framework on all IP portions of its network and has instituted a robocall mitigation program for all other originating traffic. Our company is fully committed to industry best practices and FCC requirements for preventing the origination of illegal robocalls.

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