

Robocall Mitigation Program Description — NovalP CORP

Company Identification

- **Entity Name:** NovalP CORP
- **Entity Type:** Private Sector, Corporation
- **FRN:** 0036122232
- **EIN:** 46-5765705
- **Contact Organization:** NovalP CORP
- **Contact Position:** CEO
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1) Purpose and Scope

NovalP CORP implements and enforces a Robocall Mitigation Program designed to prevent illegal robocalls from originating on its network. This description outlines the specific reasonable steps NovalP CORP takes to mitigate illegal robocall traffic.

2) STIR/SHAKEN Implementation

NovalP CORP **does not implement STIR/SHAKEN directly at this time**. Traffic is delivered via an upstream provider. For calls that are not authenticated with STIR/SHAKEN, NovalP CORP applies the mitigation controls described below.

3) “Know Your Upstream Provider” (KYSUP)

- NovalP CORP uses **DIDWW** as its upstream provider.
- NovalP CORP maintains documented relationships with its upstream provider and limits interconnection to trusted providers.
- Contracts and onboarding documentation include obligations related to preventing illegal robocalls and cooperation on investigations.

4) Call Analytics Systems and Ongoing Monitoring

NovalP CORP uses internal call analytics and monitoring to detect and mitigate suspicious activity, including:

- Unusual spikes in call volumes or call attempts.
- Abnormally short call durations at scale.
- Rapid sequential dialing patterns.
- Concentrated traffic to narrow destinations or number ranges.

Flagged traffic is reviewed promptly. Mitigation actions (below) are applied as appropriate.

5) Monitoring and Response Actions

When NovalP CORP identifies suspected illegal robocalls or abusive patterns, the company may:

- Notify the customer and request corrective action.
- Apply rate caps or temporary restrictions.
- Block specific destinations or CLIs associated with the activity.
- Suspend or terminate service where violations persist.

6) Traceback Response

NovalP CORP **promptly responds** to traceback requests from regulatory bodies, law enforcement, and industry traceback consortiums. The compliance contact listed above is used for these purposes.

7) Contractual Provisions

Customer and upstream-provider agreements include provisions that:

- Prohibit the origination of illegal robocalls.
- Require cooperation with investigations and traceback.
- Permit immediate suspension or termination of service for violations.

8) Specific Steps for New / Returning (Non-Renewing) Customers

Before activating outbound service, NovalP CORP:

- Verifies the customer's identity and business information (Know Your Customer).
- Reviews the intended use case for outbound calling.
- Confirms authorization to use any proposed Caller ID numbers before enabling them.

9) Caller ID (CLI) Management

Only validated Caller IDs are permitted. The following Caller IDs are currently registered and authorized for use and may increase over time:

+1 786 508 0077
+1 786 605 0595
+1 754 208 1919
+1 786 233 7499
+1 305 686 7967
+1 786 706 8118
+1 786 504 7045
+1 888 230 8333
+1 305 686 9633
+1 312 680 3313
+1 817 886 8289
+1 786 789 2381
+1 817 886 2907
+1 305 404 6013
+1 470 300 5225
+1 470 300 7181
+1 866 240 3338
+1 866 240 6663

New Caller IDs are added only after validation and authorization.

10) Recordkeeping and Updates

NovalP CORP maintains records of customer vetting, Caller ID authorizations, traffic reviews, and mitigation actions. This program is reviewed and updated as needed.

Compliance Contact:



Julian Etayo, CEO

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1 786 233 7499