

Robocall Mitigation Plan

Clearnetworx
301 N. Cascade Ave
970-240-6600

Clearnetworx provides SIP connectivity to customers as a reseller of wholesale VoIP service. Clearnetworx obtains VoIP service for resale from White Label Communications LLC (RMD0003583; FRN 0021336482). Clearnetworx does not own or operate switching facilities used to originate calls on the public telephone network. Customer traffic traverses the upstream provider network for call routing and caller authentication.

Affiliates

For purposes of this Robocall Mitigation Plan, Clearnetworx identifies the following as affiliates: FastTrack, VFN, and VB.

Know Your Customer

Clearnetworx performs customer vetting prior to activating service and re-evaluates customers when potential abuse indicators arise. Clearnetworx's customer vetting focuses on collecting and maintaining sufficient customer identity and contact information, understanding the intended use of service at a high level, and ensuring customers agree to contractual terms that prohibit unlawful robocalling and require cooperation with traceback and investigations.

- Collect customer name, service address, and billing contact information (phone number and/or email address).
- If the customer is porting telephone numbers from another provider, obtain a recent bill from the losing provider that matches the customer's name.
- Confirm the customer's intended use of the service at onboarding (for example, business communications over SIP connectivity).
- Do not permit customers to present outbound caller ID numbers that are not assigned/provisioned for that customer through the service (no customer-provided caller ID pass-through).
- Require customers to agree to Clearnetworx's Terms of Service and Acceptable Use Policy, including prohibitions on unlawful robocalling, spoofing, and other abusive calling, and including the right to suspend or terminate service for violations or suspected illegal activity.

- Re-evaluate customers upon potential abuse indicators, including complaints or notices received from the upstream provider, and suspend service pending clarification if warranted.

Existing Customers

Clearnetworkx maintains current customer contact information for billing and service communications. Existing customers are governed by Clearnetworkx's Terms of Service and Acceptable Use Policy, including obligations to cooperate with investigations and traceback requests. Clearnetworkx re-evaluates existing customers upon indicators of potential abuse (including complaints or notices received from its upstream provider) and may suspend service pending clarification. Failure to comply with the Terms of Service may result in termination.

Know Your Upstream Provider

Clearnetworkx obtains VoIP service for resale from a single upstream provider, White Label Communications LLC. Clearnetworkx confirms the upstream provider maintains an active listing in the FCC Robocall Mitigation Database. Clearnetworkx performs this verification annually during its vendor renewal process (typically February–March) and documents the verification in its internal ticketing/CRM system, retaining the record for at least three (3) years.

Traceback

Clearnetworkx responds to traceback requests from the FCC, law enforcement, the Industry Traceback Group, and/or its upstream provider within 24 hours of receipt. Traceback requests may be delivered to Clearnetworkx via a support ticket from the upstream provider. Clearnetworkx documents traceback requests and its response/actions in an account-level ticket in its CRM and retains those records for at least three (3) years. Clearnetworkx may suspend service pending investigation and clarification and may terminate service for violations of its Terms of Service or Acceptable Use Policy.

Robocall Mitigation Program

Clearnetworkx relies on call authentication and robocall mitigation capabilities implemented by its upstream provider for traffic traversing the upstream provider network, including STIR/SHAKEN implementation in the IP portions of the upstream network. Clearnetworkx complements those upstream controls with its customer vetting, contractual restrictions,

and ability to suspend or terminate service in response to suspected illegal robocall activity. Clearnetworkx will take appropriate steps to mitigate illegal robocall traffic, including responding to traceback requests within 24 hours of receipt and taking action to prevent continued abuse.

Call Abuse Policy

Clearnetworkx notifies customers of its call abuse policy as copied below:

“Any call originated on the Clearnetworkx network is subject to inspection and investigation if the call is suspected of being fraudulent, abusive, or illegal. Calls meeting any of these criteria will be blocked. If these conditions are repeated, becoming excessive, the subscriber may be disconnected from the Clearnetworkx network, may be subject to further investigation by the FCC for enforcement of the TRACED Act and the subscriber may be subject to fines and penalties imposed by the FCC or the jurisdictional court.”