

Telespan LLC
ROBOCALL MITIGATION PLAN

Telespan LLC (“Telespan”) is a broadband provider that offers interconnected VoIP services to its subscribers on a resold basis. Telespan’s underlying voice service provider is Vitelity, an APNI Business, LLC service and subsidiary of Inteliquent, Inc. (“Vitelity”), which is registered in the Robocall Mitigation Database and performs first-party STIR/SHAKEN authentication on calls originated by Telespan’s end-user customers.

While Telespan necessarily relies on Vitelity’s robocall mitigation policies, procedures, and safeguards, Telespan has also adopted this robocall mitigation plan to take its own measures to limit the potential for the origination of unlawful robocalls by its customers that would be carried and processed by Vitelity or other downstream providers.

Know-Your-Customer Policies

Subscriber Vetting: Telespan vets the identity of its customers when entering into an agreement to provide service. As part of this vetting process, the customer provides their legal name, business location, state of incorporation, federal tax ID, and other contact information. This information enables Telespan to validate the identity of potential customers prior to provisioning of service. Service will not be provided if a new customer’s identification cannot be verified.

Contractual Terms: Telespan’s terms of service prohibit the use of its voice service for fraudulent or unlawful acts or purposes, and permits the company to terminate a customer’s service for violations of its terms.

Use of Call Analytics to Identify and Block Unlawful Traffic

Telespan relies on Vitelity’s use of call analytics systems to identify and block unlawful robocall traffic as set forth in its robocall mitigation plans on file with the FCC. Vitelity reports that it uses network tools to combat illegal robocalls, including, but not limited to, automatic number identification management that identifies and blocks originating telephone numbers from sending calls that are believed to be unlawful based on repeat attempts, proactive blocking of telephone numbers on Do Not Originate (“DNO”) lists, and a randomizer based on call analytics that requires the calling party to listen to an announcement and enter two randomly generated digits to complete the call.

If Telespan receives a report or alert from Vitelity of suspected unlawful robocall traffic originated by a Telespan end user customer, Telespan will conduct an investigation and will work internally to identify the party that is potentially originating illegal robocalls. To the extent a customer is found to have violated terms, Telespan will take action commensurate with the severity of the customer’s offense, including, but not limited to, providing the customer with a warning or terminating the customer’s service.

Knowledge of Upstream Provider

Telespan's sole upstream provider, Vitelity, is a well-known, reputable voice service provider that is registered in the FCC's Robocall Mitigation Database. Telespan does not itself have knowledge or insight into upstream providers from which Vitelity receives traffic, but understands from its mitigation plan that its direct upstream connections are with service providers that similarly have represented to the FCC that they have policies and procedures to identify and block unlawful robocall traffic.

Cooperation with the Traceback Group, Law Enforcement and Government Agencies

Telespan is committed to responding fully and within 24 hours to all traceback requests made by the Industry Traceback Group ("ITG"), law enforcement authorities, and government agencies to investigate and address suspected unlawful robocalls originated by Telespan customers.

Telespan is also committed to cooperating with its wholesale provider on traceback requests and to fully complying with the Commission's robocall blocking requirements. Telespan understands that Vitelity will block calls and provider traffic that: (1) are identified in any public notice or order released by the FCC; (2) are substantially similar to the types of traffic identified in any public notice or order released by the Commissions; or (3) include a caller ID number or name that is on the DNO list issued by the ITG.