

WAVV Communications Robocall Mitigation Plan and Certification

Company Information:

WAVV Communications
1411 West 1250 South, STE 102
Orem, UT 84058

FRN:

0037388519

Contact for Robocall Mitigation Inquiries:

Attn: Compliance Department
legal@wavv.com

1. Purpose

WAVV Communications provides this Robocall Mitigation Plan ("Plan") in compliance with the Federal Communications Commission (FCC) rules, including WC Docket No. 17-97 and 47 CFR § 64.6305(d)(ii)-(iii). The Plan outlines the measures WAVV Communications takes to prevent illegal robocalls and ensure lawful use of our network. WAVV has fully implemented **STIR/SHAKEN authentication** across all IP portions of our network, ensuring call integrity and traceability.

2. Subscriber Verification and Risk Management

WAVV's approach starts with verifying who is using our services and monitoring for risk:

2.1. Know Your Customer (KYC) Protocol

- All users undergo identity verification via **StripeID**, which validates date of birth and Social Security Number.
- If automated verification fails, users complete a **document verification** with a government-issued ID and document authentication check.
- Accounts cannot originate calls until verification is complete.

2.2. Risk Assessment

- New accounts are screened for fraud risk using internal blocklists of previously suspended users.
- We monitor ongoing voice traffic for signs of fraud, including keywords, phrases and poor traffic statistics. Offenders are automatically blocked, and other indicators flag accounts for manual review.

2.3. Acceptable Use

- All users must agree to our **Terms of Service**, which prohibit illegal calls, including those violating the TCPA.
 - Users who violate our terms are suspended or terminated.
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3. Traffic Monitoring and Analytics

WAVV continuously monitors call traffic to detect and prevent illegal activity:

3.1. AI Content Analysis

- Proprietary AI analyzes call content in real time for keywords or patterns indicative of robocall activity.

3.2. Pattern Monitoring

- We track call anomalies such as:
 - High volumes of short-duration calls
 - Frequent SIP 603/608 errors
 - Repetitive or non-conversational call patterns
- Accounts exhibiting suspicious activity are flagged for investigation.

3.3. Enforcement Protocol

- Users cannot initiate calls to randomly generated or sequentially dialed numbers. This restriction ensures that WAVV customers are unable to use the system for indiscriminate robocalling or unlawful call campaigns.
 - Accounts flagged for illegal activity are **immediately suspended**, preventing call origination.
 - Users must complete government ID verification and provide a legitimate business use case to regain access.
 - Voicemail recordings containing flagged content are hidden from the user interface to prevent misuse.
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4. Industry Cooperation and Traceback Compliance

4.1. Upstream Provider Collaboration

- Our upstream providers are:
 - Twilio Inc.
101 Spear Street, 5th Floor
San Francisco, CA 94105
support@twilio.com
 - Flowroute, Inc.
4200 Bohannon Drive, Suite 120
Menlo Park, CA 94025
support@flowroute.com
- We collaborate with our provider(s) to trace and mitigate illegal traffic, ensuring compliance with the FCC Robocall Mitigation Database.

4.2. Traceback Requests

- WAVV responds fully to all traceback requests from the FCC, law enforcement, or the Industry Traceback Group (ITG) within 24 hours.

4.3. Do Not Originate (DNO)

- WAVV honors all DNO requests to prevent spoofing of legitimate numbers.

5. Plan Maintenance

- This Plan is regularly reviewed and updated as needed.
- Material changes are filed with the FCC Robocall Mitigation Database within ten (10) days.

6. Certification

I  President and Chief Operating Officer of WAVV Communications, certify under penalty of perjury that:

- A. The business name and address are correct.
- B. WAVV Communications has not previously used any other business name.
- C. The designated contact for robocall inquiries is listed above.
- D. Ownership information:
 - a.  CEO
- E. WAVV Communications acts as a **voice service provider**.
- F. STIR/SHAKEN has been fully implemented across our network.
- G. WAVV Communications is not prohibited from filing in the Robocall Mitigation Database.
- H. WAVV Communications has not been the subject of any enforcement or investigation for unlawful robocalling or spoofing.
- I. WAVV Communications does not have an Operator Code Number.




President, COO