

PhoneOne Robocall Mitigation Plan (RMP)

Company Name: PhoneOne (A BSC Group Company)

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FRN: 0028698868

Address: 300 Colonial Center Pkwy, Ste 100, Roswell GA 30076

I. Introduction

PhoneOne is a Voice Service Provider providing interconnected VoIP services to business and residential customers. We utilize the SkySwitch platform for call origination and termination. This Robocall Mitigation Plan (RMP) outlines the specific, reasonable steps PhoneOne takes to ensure that no illegal robocall traffic originates from our network.

II. Know Your Customer (KYC) Procedures

PhoneOne implements a rigorous "Know Your Customer" protocol to vet all new and existing clients. Before service is activated, PhoneOne requires:

- **Business Verification:** Collection of a valid Tax ID (EIN) and a physical U.S. business address.
- **Operational Review:** A description of the customer's business model and the intended use of our VoIP services.
- **Financial Vetting:** Verification of banking or credit card details associated with a U.S. financial institution.
- **Contractual Prohibitions:** All Service Agreements explicitly prohibit the use of PhoneOne services for illegal robocalling, spoofing, or any activity that violates the TCPA or FCC regulations.

III. Traffic Monitoring and Analytics

PhoneOne leverages both internal oversight and the advanced analytics provided by our

upstream platform (SkySwitch) to monitor traffic patterns:

- **Anomaly Detection:** We monitor for high-volume bursts, low Answer Seizure Rates (ASR), and high percentages of Short-Duration (SD) calls, which are typical indicators of illegal robocalling.
- **Threshold Alerts:** Our platform triggers alerts for traffic that deviates significantly from a customer's historical baseline.
- **Suspension Protocol:** In the event of suspicious activity, PhoneOne reserves the right to immediately suspend service while a manual investigation is conducted.

IV. 24-Hour Traceback Commitment

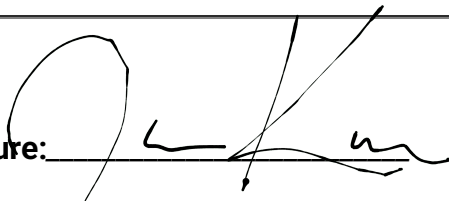
PhoneOne fully commits to responding to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG).

- **Response Time:** PhoneOne maintains an internal policy to respond to all traceback requests within **24 hours** of receipt.
- **Point of Contact:** We maintain a dedicated support line (**470-592-3939**) and email (**support@phoneone.net**) to ensure immediate receipt of these requests.
- **Cooperation:** PhoneOne will cooperate fully with investigating entities to identify the source of any illegal traffic and take immediate corrective action, up to and including permanent termination of service for offending users.

V. Upstream Provider Integration

While PhoneOne performs independent mitigation, we also rely on SkySwitch to implement STIR/SHAKEN authentication for calls originating from our users. We regularly review our upstream provider's compliance status to ensure our traffic is being handled according to the highest industry standards.

Authorized Signature:

A handwritten signature in black ink, appearing to read 'J. Kubicek', is written over a horizontal line.

James D. Kubicek

Owner/Operator, PhoneOne