

ROBOCALL MITIGATION PLAN

Velocity Communications Inc. is a voice service provider (VSP) dedicated to stopping illegal calls from originating in our network and monitoring the calls coming into our network. The FCC requires that, by June 30, 2021, all VSPs certify in the Robocall Mitigation Database that they have (1) fully implemented STIR/SHAKEN across their entire network, (2) implemented STIR/SHAKEN on a portion of their network and that the remainder of the calls are subject to a Robocall Mitigation Plan (RMP), or (3) have not implemented STIR/SHAKEN but subject all calls to an RMP to ensure that the network is not originating illegal robocalls.

The FCC requires that VSPs develop an RMP that:

- Lists the specific, reasonable steps the VSP has taken to avoid originating illegal robocall traffic
- States a commitment to respond fully and promptly to all traceback requests from the FCC, law enforcement, and the industry traceback consortium
- To cooperate with entities investigating and stopping any illegal robocallers that use its services to originate calls

Velocity Communications Inc. purchases origination, termination, and hosted-switch access from Atheral LLC (FRN 0028070290), which provides crucial elements of our RMP as part of their interconnected white-label VoIP wholesale services to Velocity Communications Inc..

Know Your Customer

We follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group.

International Subscribers

Velocity Communications Inc. does not sell origination or termination services to subscribers outside the United States.

Acceptable Use Policy

Velocity Communications Inc. maintains an Acceptable Use Policy ("AUP") that subscribers must sign before being permitted to use Velocity Communications Inc.'s broadband or voice services. Among other things, this AUP prohibits:

Customer shall not: (i) make the Services and/or Equipment available, nor permit the Services and/or Equipment to be made available or to provide Internet, telephone or similar Services to one or more third parties (with the exception of temporary use 'guest' networks within the Customer Premises); (ii) resell or transfer the Services or Equipment to any other person for any purpose, or charge others to use the Services or Equipment (with the exception of Enterprise Services); (iii) use the Services in any manner contradictory to this Agreement; (iv) tamper with,

disrupt, or “hack” any Service or Equipment; or (v) make use of the Services or Equipment in any way inconsistent with their intended purpose.

The Services and Velocity Communications Equipment may be used only for lawful purposes. Customer may not use the Services or Velocity Communications Equipment in order to create, transmit, or store any information, data or material (a) in violation of any applicable law, (b) in a manner that will infringe the copyright, trademark, trade secret or other intellectual property rights of others, (c) that will unlawfully violate the privacy, publicity, or other personal rights of others, or (d) that is illegal or contains a virus, worm, or other malware. Customers may not use the Services and Velocity Communications Equipment in a way that violates applicable federal, state, or local laws or regulations regarding unsolicited, false, or fraudulent e-mail or electronic communications.

Traceback Requests

Velocity Communications Inc. is committed to responding promptly to all traceback requests from the Federal Communications Commission, law enforcement, state attorneys general, Atheral LLC, and the industry traceback consortium. Furthermore, Velocity Communications Inc. is committed to cooperating with such entities in investigating and stopping any illegal robocallers that use Velocity Communications Inc. service to originate calls. Subscribers are required to comply with traceback requests via our AUP. Traceback requests can be sent to legal@velocitywa.com for immediate processing by Velocity Communications Inc..

Telephone Number Validation

If a subscriber wishes to use a telephone number (TN) as a caller identity and that TN is not directly managed by Velocity Communications Inc. or our wholesale partner Atheral LLC, then TN validation is necessary by requiring the subscriber to provide a valid letter of authorization that they are an authorized user of such TN. Should the subscriber provide sufficient documentation to Velocity Communications Inc. of authorization to use a TN, documentation will be provided to Atheral LLC so that they can attest calls originated with these TNs.

Investigation of High-Volume Network Traffic, Suspicious Calls, and Calling Patterns

Our wholesale VoIP provider, Atheral LLC, uses TransNexus’s ClearIP solution to monitor our origination voice traffic in real-time to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts Atheral LLC if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database, or has a poor reputation. Atheral will immediately ask Velocity Communications Inc. to investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If Velocity Communications Inc. or Atheral LLC determines that the caller was attempting to originate unlawful robocalls, we either warn them to stop or terminate their service based on our AUP.

Examples of calling patterns monitored:

- Higher than expected cost generated by calls from a subscriber
- Targeted pumping of repeated calls to a specific called number within a 15-minute period
- Fast traffic pumping of repeated calls to a specific called geographic location within a 5-minute period
- Slow traffic pumping of repeated calls to a specific called geographic location within a 60-minute period
- Theft of service traffic pumping of repeated calls to a high-cost geographic location within a 60-minute period
- Recent call volumes (last 60 min) vs weekly trends
- Number of unique destination numbers in a 60-minute time frame
- Irregularities in Short Call Duration (SDC) and Average Call Duration (ACD) distribution
- Anomalies in Answer-Seizure Ratio (ASR)
- Robocalling triggers monitoring for a high volume of outbound calls or excessive incoming calls from the same calling number
- Wangiri trigger monitoring for origination calls to high termination rate destinations with short duration (to trigger end-users to call back) for all calls over a 5-minute duration
- Analysis of recent and past Call Detail Records (CDRs) to benchmark against expected trends

STIR/SHAKEN Implementation Timeline

Atheral LLC has fully implemented STIR/SHAKEN as of June 30th, 2022.