

## **Biz-VoIP, Inc. Robocall Mitigation Program**

Biz-VoIP, Inc. is a non-facilities-based reseller of voice over Internet Protocol (VoIP) service. Our wholesale network provider is SkySwitch. This Robocall Mitigation Plan describes the specific reasonable steps that Biz-VoIP, Inc. has taken to avoid the origination, carrying, or processing of illegal robocall traffic on our wholesale provider's network.

### **Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Robocalls**

Biz-VoIP, Inc. has a "know-your-customer" policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. Biz-VoIP, Inc. vets the identity of all new and renewing end-user customers, which are mostly businesses customers. In particular, we collect information from our business customers such as their physical business location, contact person(s), state or country of incorporation, federal tax ID, and the general nature of their business. Biz-VoIP, Inc. has never received a request for high-volume origination services, but were we to receive such a request, we would exercise caution and extensively investigate the requesting entity prior to providing service.

Biz-VoIP, Inc. has enforceable terms and conditions for the use of its services that define the circumstances by which we will deny, suspend, or terminate service to a customer. Likewise, our contracts with business customers contain provisions that allow termination in the instance that services are being abused. Biz-VoIP, Inc. would not hesitate to suspend or terminate service to a customer that we discovered was using, or attempting to use, our services to originate illegal calls.

In addition, the Terms of Service agreement between SkySwitch and Biz-VoIP, Inc. contains acceptable use and traffic integrity terms that prohibit the use of SkySwitch's services for illegal robocalling. Consequently, If SkySwitch were to find that an end-user customer of Biz-VoIP, Inc. was originating illegal calls, SkySwitch could require the suspension or termination of the customer's service.

### **"Know-Your-Upstream Provider" Procedures**

Biz-VoIP, Inc. relies upon the "Know-Your-Upstream Provider" procedures of its wholesale provider, SkySwitch. Biz-VoIP, Inc. is confident that SkySwitch exercises due diligence prior to accepting traffic from an upstream provider.

### **Use of Call Analytics Systems**

Biz-VoIP, Inc.'s wholesale network provider, SkySwitch, utilizes internal data analytics to monitor its network for irregular and unexpected traffic patterns that appear abusive. If SkySwitch identified a suspicious traffic pattern originating from a Biz-VoIP, Inc. end-user

customer, SkySwitch would contact us, and together we would determine a course of action to promptly investigate the matter and address any illegal calling that was occurring. Also, SkySwitch has the ability to limit any end-user customer's calling capacity via call per second and/or concurrent session limits.

In addition, SkySwitch uses proprietary call analytics systems and processes to identify and block illegal robocall traffic bound for Biz-VoIP, Inc.'s end-user customers. By default, SkySwitch blocks calls purporting to originate from numbers on a reasonable do-not-originate (DNO) list.

### **Commitment to Respond to Traceback Requests**

Biz-VoIP, Inc. commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping illegal robocallers that use its services to originate, carry, or process illegal robocalls.