

Online Owls, LLC Robocall Mitigation Plan

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1. Introduction

Online Owls, LLC is a Voice Service Provider providing interconnected VoIP services to end-user customers. Online Owls, LLC operates as a white-label reseller utilizing the SkySwitch (a division of BCM One) platform. While Online Owls, LLC lacks the network infrastructure to implement STIR/SHAKEN directly, we take significant reasonable steps to mitigate illegal robocall traffic originating on our network through strict vetting and upstream provider collaboration.

2. STIR/SHAKEN Implementation Status

Online Owls, LLC certifies that it has not yet implemented STIR/SHAKEN on its own network because it lacks control over the underlying switching infrastructure. However, Online Owls, LLC relies on its upstream provider, **SkySwitch**, to perform STIR/SHAKEN authentication and signing of calls. All calls originated by our customers are transmitted to SkySwitch, which then applies the appropriate attestation levels.

3. Know Your Customer (KYC) Procedures

To prevent the origination of illegal robocalls, Online Owls, LLC employs the following KYC protocols:

- **Identity Verification:** We require all new business customers to provide a valid Tax ID (EIN), physical business address, and authorized point of contact.
- **Use Case Review:** We review the intended use of the voice service. We do not knowingly provide service to high-volume telemarketing firms or automated "dialer" traffic.
- **Service Agreements:** Our Master Service Agreement (MSA) and Acceptable Use Policy (AUP) explicitly prohibit the use of our services for illegal robocalling, spoofing, or any activity that violates the TCPA or TRACED Act.

4. Robocall Mitigation & Monitoring

Online Owls, LLC utilizes a multi-layered approach to monitor and mitigate suspicious traffic:

- **Upstream Integration:** We utilize SkySwitch's integrated fraud and robocall mitigation tools to identify and block known malicious callers.
- **Traffic Analysis:** We monitor Call Detail Records (CDRs) via our reseller portal for "short-duration" call spikes or high-volume patterns that are indicative of illegal robocalling.

- **Fraud Triggers:** Our platform is configured with automated fraud triggers that alert our technical team or automatically suspend accounts if calling patterns exceed reasonable business thresholds.

5. Traceback Cooperation

Online Owls, LLC is fully committed to cooperating with law enforcement and the **Industry Traceback Group (ITG)**.

- **24-Hour Response:** We commit to responding to all traceback requests within 24 business hours.
- **Enforcement:** If a customer is identified as the source of illegal traffic via a traceback, Online Owls, LLC will immediately investigate and, if necessary, terminate the customer's service without notice.

6. Conclusion

Online Owls, LLC remains vigilant in the fight against illegal robocalls and will continue to update this plan as new technologies and regulatory requirements emerge.

Certified by:

Bruno Bianchi

CEO, Online Owls, LLC