



Prime Voiceonline, LLC Robocall Mitigation Plan

We are a reseller of Level365 Holdings, LLC (RMD0006904)) and do not have the capability to implement STIR/SHAKEN. Level365 has implemented STIR/SHAKEN protocols in their IP Voice networks.

We have not been prohibited from filing a certification in the Robocall Mitigation Database.

Prime Voiceonline, LLC, nor any of our executives or principals have a history of enforcement actions for illegal robocalls, TCPA or TSR violations or related state law violations.

We use the affirmative and effective measures detailed below to prevent the origination or transit of illegal robocalls.

Know Your Customer

We follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>).

To prevent malicious actors from gaining access to our services, Level365 implements a rigorous vetting process:

1. Information Accuracy: New and renewing customers must provide accurate and complete legal and contact information.
2. Verification Tools: We employ third-party tools to validate customer information.
3. Behavior Monitoring: Anomalous account activities, such as unusual IP addresses or payment methods, are flagged and investigated.

Traceback

We respond to all traceback requests from the Commission, law enforcement, and the registered traceback consortium within 24 hours and cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls.

STIR/SHAKEN Implementation

We are a reseller of voice services hosted on VoIP platforms by Level365 Holdings, LLC and do not have the capability to implement STIR/SHAKEN. Level365 has implemented STIR/SHAKEN protocols in their IP Voice networks (RMD0006904).

Robocall Mitigation Program

We rely on software provided by Level365 to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls. Level365 utilizes 24/7 real-time traffic monitoring tools to detect and address abnormal call patterns.

- Investigate suspicious traffic and terminate offending accounts.
- Monitor SMS traffic to prevent misuse.
- Analyze traffic patterns to proactively identify threats.
- Provide Call Blocking Support for accurate identification enabling you to block fraudulent phone calls as per the TRACED Act (2019).
- Provide Caller ID Name Service for easy integration of Caller ID name lookup service, including robocall mitigation with override to include original caller ID even when call is determined fraudulent.
- We comply with the FTC's rules for the Do Not Call Registry.
- Our carrier partner screens all originated calls against a national Do Not Originate list per FCC rules.

In addition, we have implemented a Call Abuse Policy, as it pertains to the TRACED Act, and have published the following policy to our web site, terms of use, and have notified our customers of the policy as copied below:

“Any call originated on the Prime Voiceonline, LLC network is subject to inspection and investigation if the call is suspected of being fraudulent, abusive, or illegal. Calls meeting any of these criteria will be blocked. If these conditions are repeated, becoming excessive, the subscriber may be disconnected from the Prime Voiceonline, LLC network, may be subject to further investigation by the FCC for enforcement of the TRACED Act and the subscriber may be subject to fines and penalties imposed by the FCC or the jurisdictional court.”