

Robocall Mitigation Plan

Overview

The FCC requires that all providers certify in the Robocall Mitigation Database their status for compliance with STIR/SHAKEN. Those not yet fully compliant must implement and certify to the implementation of a Robocall Mitigation Plan to ensure that this illegal traffic does not originate on their networks as they work within the industry to become fully compliant.

The Commission requires voice service providers to develop a Robocall Mitigation Plan that:

- Details the reasonable steps taken to avoid originating illegal robocalls
- Demonstrates a commitment to respond to traceback requests to cooperate with investigating and stopping illegal robocalls
- Is filed in the Robocall Mitigation Database.

This mitigation plan is submitted on behalf of HV Tech Solutions Inc., a small voice service provider. HV Tech Solutions is partnering with Skyswitch, Inc. to implement STIR/SHAKEN.

General Prohibition Against Illegal Robocalling

HV Tech Solutions end user services are subject to restrictions contained in its published legal notices and all executed services orders include the requirement that service is provided pursuant to its terms of service. Its existing terms prohibit activities normally associated with Robocalling including, but not limited to Robocall Mitigation Policy to:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable local, state, or federal law; using the HV Tech service to engage in or in connection with fraudulent activities

In addition, end users are notified that HV Tech may take action up to suspension or termination of service for violation of the terms.

Customer Vetting Practices

As a means of preventing or minimizing the origination of illegal robocalls through its outbound voice services, HV Tech Solutions will use best practices in vetting the identity of all of its voice service customers. The customer vetting process is intended to help determine the legitimacy of a customer for the purpose of establishing a service relationship. Generally, HV Tech looks to confirm the identify of customers using its outbound voice services through collecting information such as physical customer location, contact person(s), state of incorporation, federal tax ID, and the nature of the customer's business. HV Tech will size any potential customer request(s) before provisioning any services for use. This includes number of phone numbers, potential uses, service agreements and rights to use telephony services requested. All of the

HV Tech's customers are businesses with less than ten employees. HV tech will also add robocall mitigation language to any agreements in which the potential customer seeks the use of outbound calling campaigns.

Know Your Customer

HV Tech utilizes the mitigation technique of "Know Your Customer." HV Tech is a small long-established provider that maintains a close relationship with its subscribers. Its customers are generally "mom and pop" users and none of its customers have enough call paths to generate the high volume of traffic with robocalling. HV Tech screen new customers and will not deploy large volume calling capability. HV Tech representative may visit the premise of the business to verify the number of users at the location is appropriate for the volume of calling.

Call Analytics

HV Tech maintains call details for all outbound calls. These details include but are not limited to the following.

- Call volume
- Call duration
- Only US based calls are allowed

Traceback and Enforcement Cooperation

HV Tech will actively cooperate with the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG) to investigate and stop illegal robocalls.

Traceback Request Single Point of Contact

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