

BLUFISH IT

ROBOCALL MITIGATION PLAN

Blufish IT Solutions, Inc. (Blufish IT) is a small Managed Service Provider based in South Carolina focused on supporting small businesses. Although the company does not seek to expand or grow telecommunications services to provide to its customers, the company does have a small number of customers who have requested telecommunications services.

Blufish IT is registered with the Federal Communications Commission (“FCC”) and holds the 499 Filer ID number of 835608. The Company’s FRN/CORESID Number is 0032920282.

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THE COMPANY PRIMARY PLACE OF BUSINESS

1951 Pisgah Road, Suite 134
Florence, South Carolina 29501
Phone: 843-773-9864
Main Email: support@blufish.solutions
Company Website: blufish.solutions

LEADERS OF THE COMPANY ARE:

CEO

Adam Kelly
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Florence, South Carolina 29501
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Direct Dial: 843-621-2603

DESIGNATED RMD CONTACT:

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STIR/SHAKEN COMPLIANCE

As a switchless reseller Blufish IT does not own its own network or infrastructure of any kind and therefore has no access to any IP portion of any call and/or a SIP header of any call. In this case the company, pursuant to the FCC Exemption as found in the FCC Order related to STIR/SHAKEN and Robocall Mitigation is exempt from the STIR/SHAKEN obligation.

ROBOCALL MITIGATION PLAN

This Robocall Mitigation Plan describes the specific measures that the Company has implemented to detect and prevent illegal robocalls on its network in accordance with FCC Orders. The Company will periodically evaluate the risks it faces, the effectiveness of its policies and procedures, and its capabilities to support the measures described. Should The Company determine that changes are appropriate, its practices may differ from those described below.

Risk Assessment. Blufish is a switchless reseller that offers calling products by use of an underlying platform provider who owns the infrastructure to support VoIP calling. The Company resells these services to business customers.

TRACEBACK

Blufish IT committed to cooperating with the Federal Communications Commission (FCC), law enforcement, and the industry traceback consortium in investigating and stopping any illegal robo-callers that it learns are using our service to originate calls or transit calls into the United States and territories.

The Company commits to fully responding within 24 hours to all traceback requests from the ITG, the TPTG, the FCC, and law enforcement. The Company shall cooperate with these groups to investigate and stop any illegal robo-callers from using the Company's service to carry or process illegal calls.

When notified by the FCC's Enforcement Bureau, Company shall block and report identified illegal traffic, and any substantially similar traffic, on an ongoing basis (unless Company's investigation determines that the traffic is not illegal) when Company receives actual written notice of such traffic from the Enforcement Bureau. If Company determines that the identified traffic is not illegal, Company shall provide the Enforcement Bureau with an explanation as to why Company reasonably concluded that the identified traffic is not illegal, and what steps it took to reach that conclusion.

The Company utilizes a combination of internal tools and third-party solutions to check for Do Not Originate (DNO) numbers. In addition, the Company utilizes a combination of internal tools and third-party solutions to detect invalid phone number formats, area codes and unassigned number blocks. The Company also utilizes data analytics to detect and investigate irregular and unexpected calling patterns, originating number use against customer profiles.

KNOW YOUR CUSTOMER

The Company has a rigorous KYC policy for the in order to support the Business Customers that it resells services to. The Company has an in-depth presales process where representatives of the Company work with the prospect or customer to understand all the unique factors of the Customer's business. The objective of this is two fold: a. to get to know the customer; and b. to provide the best possible service to the customer by fully understanding all facets of their business.

The Company performs validation of each of its customers and verifies the following information: legal business name, legal form of business, federal tax ID, nature of the business, primary contact person, and service address.

The Company conducts due diligence on new and renewing customers, confirming the customer's identity and, if it is a business, is incorporation documents. The Company confirms the customer's service address for all customers:

- Blufish verifies customer's business reputation prior to providing service.
- Blufish verifies customer information when contracts are renewed or services are added.
- Blufish verifies the customer's identity and their right to use the telephone number presented on calls.
- Blufish has a specific Acceptable Use Policy ("AUP") which define all Company the policies regarding the circumstances by which Blufish will deny, suspend or terminate service to a customer.

When the Company commences operations with a customer, the Company verifies all new customers with a combination of electronic and manual verification systems, credit reviews, references from trusted industry members, and previous experiences with customer executives and employees. The Company severely limits the capabilities of new accounts until these appropriate processes are complete.

Additionally, as mentioned above all Company customers are required to agree to, and; are contractually bound by Blufish strict policies, contractual terms and conditions and a Company Acceptable Use Policy ("AUP") prohibiting the act of fraudulent voice activity as a condition of doing business with Blufish.

If any customer is found to be in possible and/or or actual violation of any Company policy as it relates to suspicious traffic and/or possible fraud, the Company has the right to immediately halt, cease and/or suspend the customers account or associated telephone numbers.

Measures to Prevent or Avoid Illegal Robocalls

- Blufish has in place an enforceable terms of use and/or an acceptable use policy. Blufish also has in place policies designed to detect and prevent fraudulent traffic on its network.
- Blufish uses analytics technologies and services provided by its upstream provider and third parties to monitor traffic on its network and identify potentially unlawful call origination activity. If Blufish has a reasonable basis to believe that a customer is originating illegal robocalls, it will require the customer to remedy the problem and, if effective action is not taken, Blufish can suspend and/or terminate service to the customer by the use of the underlying platform which is provided by the underlying carrier.

- Blufish has a protocol to work with the Company's upstream provider to block various types of calls by default by using the tools provided to the Company by the underlying provider who supports the platform.

UPSTREAM PROVIDERS

The provisioned platform from OIT, LLC serves as the upstream provider for the company who provides platform and services to Blufish for the company to support a switchless reseller model. Since the company does not have its own infrastructure and has no access to any IP portion of any call or the SIP header of the call, OIT provides all underlying support.

OIT, LLC (dba Orsini IT, LLC)
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Miami Lakes, FL 33014
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Local: 305.967.6756
Email: support@oit.co

The Company (as a switchless reseller) by its underlying platform provider reserves the right to refuse traffic from any party at any time where robocalling or use of originating numbers that are not valid or they are not authorized to use has occurred or is suspected.

The Company (as a switchless reseller) by its underlying platform provider is able to block the originating number(s), terminating numbers(s), trunk(s) or customer, including termination of customer relationship to prevent robocalling, invalid originating number or spoofed origination number transiting the Company's networks.

COMPANY DECLARATION

The Company certifies that it has never been under investigation or committed any violations within the last two years with any local, state, or Federal agency or equivalent related to telemarketing or robocalling. Additionally, the Company is not currently subject to a formal action or investigation due to suspected unlawful robocalling or spoofing.

If when and as the Company business may change designated Company representatives only will update this RMP as appropriate.