

ROBOCALL MITIGATION PLAN

SPITwSPOTS, Inc. (“SPITwSPOTS”) offers its customers Voice Over Internet Protocol (VoIP) services as a reseller of white-labeled services offered by Atheral LLC (“Atheral”).

SPITwSPOTS does not control the softswitch, number porting or call trunking for the associated calls. Accordingly, SPITwSPOTS does not have the facilities necessary to implement STIR/SHAKEN. SPITwSPOTS has, however, adopted this robocall mitigation plan to establish procedures intended to limit the potential for the origination, carrying, or processing of unlawful robocalls from its voice services.

PROCEDURES TO MITIGATE OR STOP ROBOCALLS

I. KNOW YOUR CUSTOMER

SPITwSPOTS follows the North American Numbering Council (NANC) - Call Authentication Trust Anchor Working Group guidelines and best practices for vetting caller identity [NANC CallerID Best Practices](#).

This includes confirming the identity of SPITwSPOTS customers – (i) contact person(s); (ii) business location; (iii) state or country of incorporation; (iv) federal tax identification; and (v) the nature of our customers’ businesses.

SPITwSPOTS services are targeted to residential and small business usage. These customers are configured for service either off systems that cannot generate more than a single call at a time or are otherwise limited in the number of concurrent calls that would render an illicit robocalling platform from operating in a cost-effective manner.

II. CONTRACTURAL TERMS

Customers using SPITwSPOTS services agree to abide by SPITwSPOTS’ Acceptable Use Policy which prohibits use of the service for unlawful activity and permits SPITwSPOTS to terminate service in such instances. SPITwSPOTS’ Acceptable Use language explicitly states: “You agree that you will not, and will not permit any person to, use the Services, or any equipment or devices for use with the Services, for any unlawful purpose [including]... in violation of applicable law.”

III. TRACEBACK

SPITwSPOTS commits to respond fully, within 24 hours, to all traceback requests from the Commission, law enforcement, and the Registered Traceback Consortium. In the event illegal robocallers use our system, SPITwSPOTS will cooperate with such entities’ investigation.

IV. ROBOCALL MITIGATION

SPITwSPOTS' underlying voice provider, Atheral, has committed to fully complying with Commission's robocall blocking requirements and has confirmed that it will block all calls and provider traffic that: (1) are identified in any public notice or order released by the FCC; (2) are substantially similar to the types of traffic identified in any public notice or order released by the Commission; or (3) include a caller ID number or name that is on DNO list issued by ITF. Atheral also blocks the traffic of all foreign providers and gateway providers that have not registered in the Robocall Mitigation Database.

V. KNOW YOUR UPSTREAM PROVIDER

SPITwSPOTS has an agreement in place with Atheral to resell Atheral's VoIP offering to SPITwSPOTS customers. SPITwSPOTS has confirmed that Atheral is listed in the Robocall Mitigation Database and that Atheral has Know Your Upstream Provider provisions in place.

VI. CALL ANALYTICS SYSTEMS

Atheral uses TransNexus' ClearIP Solution to monitor origination of voice traffic in real-time to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts Atheral if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database, or has a poor reputation. Atheral will immediately ask SPITwSPOTS to investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If SPITwSPOTS or Atheral determine that the caller was attempting to originate unlawful robocalls, our policy is to warn them to stop, suspend their service, and/or terminate their account.

VII. PLAN UPDATES

SPITwSPOTS will continue to monitor industry best practices and improve our internal processes to ensure our systems adapt to address the ongoing challenges affecting this industry.