

Robocall Mitigation Plan

Business Information

Previ Inc.
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Contact Information

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Overview

In the Commission's recent release, *Call Authentication Trust Anchor*, Sixth Report and Order and Further Notice of Proposed Rulemaking, 38 FCC Rcd. 2573 (2023) ("R&O"), it is stated that all voice service providers ("VSPs") must file robocall mitigation plans ("RMPs") that, among other things, outline "reasonable steps" taken to avoid originating illegal robocalls.

In addition to the "reasonable steps," the FCC requires that a RMP include:

- "know your customer" procedures;
- "know your upstream provider";
- ownership information;
- a description of any call analytics system used to identify and block illegal traffic; and
- whether a third-party vendor is used and if so, the name of the vendor.

The FCC previously stated that a RMP is sufficient if the detailed practices in the plan can reasonably be expected to significantly reduce the origination of illegal robocalls and the VSP complies with the practices it describes in its filing.

Background

Previ Inc. ("Previ") offers a personal consumer wireless offering provided to verified W-2 employees of contracted employer partners. The service is not marketed or usable for mass-originated telemarketing or high-volume outbound calling.

Controls include:

- (a) strict KYC through employer-verified enrollment;
- (b) contractual prohibitions in Previ's member Terms of Service against using the service for unlawful calling, automated dialers, or telemarketing;
- (c) reliance on STIR/SHAKEN signing performed by our upstream MVNO partners (AireSpring / AT&T and T-Mobile for Business) on calls originated from Previ-assigned numbers;
- (d) monitoring of anomalous call patterns via upstream carrier analytics and member activity alerts;

- (e) prompt line suspension authority for any member line identified as a source of unlawful traffic; and
- (f) a defined traceback response workflow with a 24-hour SLA.

Purpose

Previ is a small VSP dedicated to stopping illegal calls from traversing our network and monitoring the calls coming into our network. Previ is a “pure reseller” that has no control over the infrastructure necessary to implement STIR/SHAKEN. As such, Previ was previously exempt from the FCC’s STIR/SHAKEN rules. The R&O requires that pure resellers such as Previ now file RMPs. This document delineates Previ’s RMP. Because Previ does not have access to the necessary infrastructure, it relies on its upstream carrier to assist in robocall mitigation. As delineated herein, Previ works closely with its upstream provider to carry out the required mitigation functions.

Know Your Customer (“KYC”)

Previ Inc operates as a pure-reseller MVNO offering personal consumer wireless service exclusively to verified W-2 employees of contracted employer partners, through a Direct-to-Employee (DTE) distribution model. Previ does not market or sell wireless service to the general public, does not offer wholesale or bulk-line products, and does not operate voice infrastructure. Every member line is one-to-one with a named, verified individual at a known employer. This delivery model produces unusually strong KYC by design, substantially reducing illegal-robocall risk relative to typical MVNO resellers.

To activate a line, a member must:

- (a) be an active employee at a Previ-contracted employer (validated via employer-supplied eligibility files and/or single-use access codes issued by the employer);
- (b) complete identity verification during onboarding;
- (c) provide valid payment information tied to recurring monthly billing through Previ’s platform; and
- (d) accept Previ’s Member Terms of Service, which prohibit use of the line for unlawful calling or telemarketing.

There are no bulk-line or wholesale sign-ups; each line is provisioned one-to-one to a named, verified individual. Caller ID on outbound calls is the NANP number assigned by our upstream MVNO partner to that specific member; members cannot inject arbitrary Caller IDs. Payment is recurring and capped at consumer-scale usage.

Know Your Upstream Providers

In accordance with the Commission’s directive in *Advanced Methods to Target and Eliminate Unlawful Robocalls*, and *Call Authentication Trust Anchor*, Seventh Report and Order in CG Docket 17-59 and WC Docket 17-97, Eighth Further Notice of Proposed Rulemaking in CG Docket 17-59, and Third Notice of Inquiry in CG Docket 17-59, 38 FCC Rcd 5404 (2023), ¶¶ 49-51, Previ provides the following information concerning its upstream voice service carrier.

Previ has one upstream provider from which it receives voice traffic:

Airespring, Inc.
600 Cleveland Street

Suite 226
Clearwater FL 33755
David Hess
David.hess@airespring.com

Previ has a master service agreement with its upstream provider, which has assured Previ that it has, and will continue to, sign calls transmitted to Previ and will abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to Previ. Previ and its upstream provider have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Acceptable Use Policy ("AUP")

Previ's Member [Terms of Service](#) include AUP provisions that, among other things, prohibit use of the service for:

- (a) any illegal purpose or in violation of any local, state, national, or international law;
- (b) perform any fraudulent activity including impersonating any person or entity, claiming a false affiliation or identity, accessing any other Service account without permission, or falsifying one's age or date of birth; and
- (c) resale or commercial redistribution of the service;
- (d) unlawful calls, including illegal robocalls or telemarketing in violation of TCPA/TRACED Act;
- (e) Caller ID spoofing;
- (f) autodialer / ATDS traffic; and
- (g) spam, fraud, harassment, or abuse.

Previ's contractual terms with subscribers specify that Previ may take action up to suspension or termination of service for violation of the AUP.

Investigate Suspicious Activity

Previ monitors for anomalous usage patterns via upstream MVNO partner analytics (high call volume, short call duration, high call completion-to-attempt ratios, geographically implausible patterns). Internal alerts route to the Member Services team and escalate to legal@previ.com for any suspected unlawful activity. On receipt of a traceback request (from ITG, FCC, or law enforcement), Previ logs the inquiry, confirms the specific Previ member line associated with the traced number, coordinates with the upstream carrier to pull relevant CDRs, and responds to the requesting authority within 24 hours. Confirmed illegal-traffic lines are immediately suspended pending investigation and terminated if warranted.

Because Previ does not have the infrastructure to implement STIR/SHAKEN, no third-party vendors are involved in Previ's analytics.

Previ follows Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, Previ will devote sufficient resources to provide prompt and complete resources to traceback requests. Previ will respond to traceback requests within 24 hours.

Previ works with its upstream provider to investigate suspicious activity found by the carrier's monitoring systems or reported to Previ by subscribers or third parties. The investigation could potentially result in opening a traceback request or with Previ contacting a subscriber to correct

improper use of the applicable platform, or, if the subscriber does not respond or comply, to notify its upstream provider to block their use of the platform.

For all new and renegotiated Previ contracts governing the transport of voice calls, Previ will endeavor to contractually require Previ's subscribers to cooperate in traceback investigations by identifying the upstream provider from which the suspected illegal robocall entered our network.

Blocking

Previ will implement Do Not Originate requests it receives from ITG. DNO requests received at legal@previ.com are actioned by coordinating with our upstream MVNO partners (AireSpring, T-Mobile) to block or restrict origination from the identified NANP resource; acknowledgement and confirmation provided to ITG within 24 hours.

Previ's upstream provider has mechanisms to automatically block suspicious calls using internal analytics. If Previ and/or its upstream carrier identifies suspected robocalling patterns that are confirmed with further investigation, Previ will take appropriate action which may include suspending or terminating the subscriber's use of Previ's service. Previ will cooperate with Investigative Bodies (provide a single point of contact to address traceback requests from law enforcement (including the state attorney general's office), as well as the FCC, and/or ITG; as well as documenting requests & actions taken in response thereto.

Plan Updates

This plan, along with industry best practices, will evolve to response to the dynamic nature of mitigating illegal robocalling. Previ will monitor industry best practices and continuously improve our internal processes to ensure this plan, and our system adapts to this ever-changing issue.

In the event of any material change to this plan, Previ will republish it to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.

Certification of Jefferson Lyman

I, Jefferson Lyman, COO of Previ Inc., do hereby certify, under penalty of perjury, the following:

- (1) Previ, by virtue of its status as a "pure reseller" does not have access to the necessary infrastructure to implement STIR/SHAKEN, and therefore has not implemented STIR/SHAKEN in the IP portions of its network.
- (2) Previ 's Business name and primary address are as follows:

Previ Inc.
3400 N Ashton Blvd.
Suite 160
Lehi, UT 84043
- (3) Previ has no other business names in use.
- (4) Previ has not previously used any other business name.
- (5) Previ has the following principal and owner: Brandon Rodman. He has not had any licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
- (6) Previ does not have any affiliates or subsidiaries.
- (7) The name, title, department, business address, telephone number, and email address of the individual responsible for addressing robocall-related issues are listed in the above robocall mitigation plan.
- (8) Previ's role in the call chain is that of a voice service provider without a STIR/SHAKEN obligation.
- (9) Previ has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (10) Previ is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (11) Previ is not required to have and does not have an operating company number.



Jefferson Lyman

05/08/2026