



WWT Robocall Mitigation Database Plan (RMDP)

1. Introduction

WestWard Telecommunications, LLC ("WWT") is a small voice service provider. Our customer base are generally small to medium sizes businesses, with plans for expansion to larger business classes at a later date. We are committed to adhering to all applicable regulations and best practices to minimize unwanted calls and protect our customers from fraud and harassment. This plan will be regularly reviewed and updated to ensure its effectiveness in addressing the evolving robocall landscape.

2. STIR/SHAKEN Implementation

WWT, LLC has fully implemented the STIR/SHAKEN caller-id authentication framework, and provides proper attestation across all of our outbound calls. The system will authenticate the legitimacy of a call's caller ID by verifying its origin.

3. Know Your Customer

3.1 WWT, LLC has an in-processing review for all new customers. We verify business name, address, and contact information. In addition, we verify legal structure, federal employer identification number, business description and services offered, authorized representatives and their contact information, and intended use of voice services. We periodically review customer accounts and usage patterns to identify potential abuse concerns and investigate them further if needed. We investigate complaints related to robocalls originating from with-in our network as well.

3.2 WWT, LLC 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 ("TOS") requirements.

Its existing TOS prohibit activities normally associated with Robocalling including, but not limited 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 WWT services to engage in or in connection with fraudulent activities

In addition, the company is updating its TOS to expressly reference the prohibition on robocalling and all current subscribers will receive notice of the publication of its updated TOS.

WWT's end users are notified that WWT may take action up to suspension or termination of service for violation of the TOS.

4. Know Your Upstream Providers

We communicate and coordinated with our upstream provider with any and all suspected illegal Robocall and Spam complaint, on inbound and outbound calls, and initiate an investigation upon notice of such suspected activity.

5. Traceback

WWT, LLC will respond within 24 hours to all traceback investigations initiated by the Federal Communications Commission (FCC), law enforcement, or the registered traceback consortium. We maintain detailed call records that include timestamps, originating and terminating numbers, call duration, and other relevant data. These records are crucial for identifying the source and path of suspected illegal robocalls.