

Robocall Mitigation Plan

We are a reseller of Sangoma (RMD0002434), fka VoIP Innovations (RMD0004048) and do not have the capability to implement STIR/SHAKEN. Sangoma/VoIP Innovations have implemented STIR/SHAKEN protocols in their IP Voice networks.

Sangoma (formerly VOIP Innovations)

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Compliance

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We have not been prohibited from filing a certification in the Robocall Mitigation Database.

CTCTX VOIP, LLC, nor any of our executives or principals have a history of enforcement actions for illegal robocalls, TCPA or TSR violations or related state law violations.

We use the affirmative and effective measures detailed below to prevent the origination or transit of illegal robocalls.

Know Your Customer

We follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

The accurate identification of a subscriber in the STIR/SHAKEN ecosystem is tied to a telephone number-based caller identity associated with that subscriber. A subscriber is an entity that has a business relationship with CTCTX VOIP in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

CTCTX VOIP's KYC program involves setting up and managing each customer's phone system. CTCTX VOIP is involved in making changes and supporting the systems monthly. Additionally, CTCTX VOIP obtains specific subscriber information before allowing a potential subscriber to use our services. This process includes collecting such information as: (1) business location; (2) contact person(s);

3) nature of the entity's business; and (4) credit card information. CTCTX does not work with call centers, auto dialers, or any customers that might be involved in robocalling.

Traceback

We respond within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls.

CTCTX VOIP works with its upstream provider to investigate suspicious activity found by the carrier's monitoring system or reported to CTCTX VOIP by subscribers or third parties. An investigation could potentially result in opening a traceback request or with CTCTX VOIP 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(s) to block their use of the platform.

STIR/SHAKEN Exemption

We are a reseller of voice services hosted on VoIP platforms by Sangoma/VoIP Innovations and do not have the capability to implement STIR/SHAKEN. Sangoma/VoIP Innovations have implemented STIR/SHAKEN protocols in their IP Voice networks (RMD0002434), (RMD0004048).

Robocall Mitigation Program

We rely on software provided by Sangoma/VoIP Innovations to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls.

Telephone Number Analytics:

A Telephone Number ("TN")-based caller identity is the originating phone number included in call signaling used to identify the caller for screening purposes that is uniquely associated with the subscriber. A subscriber is permitted to use a TN as a caller identity if a TN is directly managed by CTCTX VOIP and/or obtained by CTCTX VOIP from CTCTX VOIP's underlying carrier for use by the subscriber. In most cases, CTCTX VOIP directly manages the TNs used by its subscribers. CTCTX VOIP tracks these numbers in its inventory system and monitors the assignment of these numbers. In these cases, TN validation is the inherent result of CTCTX's assignment of the TN to its subscriber.

Analytics for Monitoring Traffic:

CTCTX VOIP works with its upstream providers to identify behaviors which indicate illegal call activity. Examples of calling patterns monitored:

- Anomalies in cost generated by calls from a single customer;
- multiple overlapping calls on the same account is a risk of not having a single subscriber using the service;
- velocity on initiate calls (synchron intervals, quick dialing back-to-back calls);
- recent volumes (last 60 min) vs weekly trends;
- number of unique destination numbers in a time frame (total account level);
- number of unique source numbers in a time frame (total and account level); and
- anomalies in call duration distribution (most calls having similar duration is not representative for residential service usage).

When traffic analysis indicates the presence of likely illegal robocalling, CTCTX VOIP works with its upstream provider to follow defined procedures on investigating such subscribers. Sangoma sends CTCTX VOIP notification alerts, and CTCTX VOIP also reviews phone systems with random audits and call log reporting. Other procedures include:

- checking recent and past call detail records and benchmark against expected trends;
- checking recent and past account activity and purchases;

- investigating if any system issue generates the unusual behavior;
- verifying that the call originating path is valid; and
- contacting the subscriber to understand his particular use case and validate that the activity belongs to that subscriber.

Combining behavioral analytics, caller authentication and verification, our solution features:

- **Fraud Detection:** Detection of high volume robocalling, spoofing and spam call activity.
- **Subscriber Notification:** Caller ID Name override to warn subscribers of suspicious calls.
- **Call Blocking Support:** Accurate identification enabling you to block fraudulent phone calls as per the TRACED Act (2019)
- **Business Number Verification:** Register legitimate business numbers to prevent unintentional call blocking.
- **Caller ID Name Service:** Easy integration of Caller ID name lookup service, including robocall mitigation with override to include original caller ID even when call is determined fraudulent.
- **Do Not Call Registry:** We comply with the FTC's rules for the Do Not Call Registry.
- **Do Not Originate:** Our hosted platform partner complies with the FCC's rules for Do Not Originate.

In addition, we have implemented a Call Abuse Policy, as it pertains to the TRACED Act, and have published the following policy to our web site, terms of use, and have notified our customers of the policy as copied below:

“Any call originated on the CTCTX VOIP, LLC, network is subject to inspection and investigation if the call is suspected of being fraudulent, abusive, or illegal. Calls meeting any of these criteria will be blocked. If these conditions are repeated, becoming excessive, the subscriber may be disconnected from CTCTX VOIP, LLC's network, may be subject to further investigation by the FCC for enforcement of the TRACED Act and the subscriber may be subject to fines and penalties imposed by the FCC or the jurisdictional court.”