

Affiniti Ventures, Inc.

Robocall Mitigation Plan

Affiniti Ventures, Inc., dba Nobie Mobile operates as a MVNO reselling T-Mobile USA, Inc.'s mobile platform and does not have the capability to implement STIR/SHAKEN because we do not control the underlying network infrastructure. Our upstream provider: T-Mobile USA, Inc. is headquartered at 12920 S.E. 38th Street, Bellevue, WA 98006.

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>). Information collected from subscribers includes full names, email addresses, billing details, and device identifiers.

Traceback

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

STIR/SHAKEN Extensions

We are a reseller of wireless voice services hosted on platforms by T-Mobile USA, Inc. and do not have the capability to implement STIR/SHAKEN. A T-Mobile USA, Inc. has implemented STIR/SHAKEN protocols in their networks (RMD0004209) and performs all detection and mitigation on our behalf.

Robocall Mitigation Program

We rely on software provided by T-Mobile USA, Inc. to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls. T-Mobile USA, Inc.'s system flags unusual call spikes and patterns, enabling the upstream provider to quickly identify and mitigate potential robocall threats. 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 as it pertains to voice and text messaging.

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 **Affiniti Ventures, Inc.** 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 **Affiniti Ventures, Inc.’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.”*