

Robocall Mitigation Plan

Business Information

Fourteen IP Inc
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Appleton WI 54914

Contact Information

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Overview

In the Commission's recent release, In the Matter of Call Authentication Trust Anchor, Sixth Report and Order and Further Notice of Proposed Rulemaking, WC Docket No. 17-97 (rel. March 17, 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;
- 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.

Purpose

Fourteen IP Inc is a small VSP dedicated to stopping illegal calls from traversing the network and monitoring the calls coming into our network.

As certified in the FCC's Robocall Mitigation Database, Fourteen IP Inc has fully implemented STIR/SHAKEN. In compliance with the R&O, Fourteen IP Inc submits this RMP and certification.

Know Your Customer ("KYC")

Fourteen IP Inc has implemented appropriate protocols when onboarding new or returning customers and requires them to provide sufficient information to ensure their legitimacy. Fourteen IP Inc generally requires its customers to provide the full legal name of the company (and its parent company if applicable), state or county of incorporation, the physical address of its operations, the billing name and address, the customer contact name and telephone number, federal tax ID (if it is a U.S. entity), and nature of the customer's business (list is not exhaustive).

Fourteen IP Inc also reserves the right to examine the credit record or other available external sources of credit of any applicant or customer as part of the onboarding process.

From our portal when a Customer signs up for service we gather the following information related to the Customer:

- Business Name
- Business Address
- Contact Name
- Contact Email Address
- Contact Phone Number
- Website
- Employer Federal ID Number (FEIN)
- IP Address they signed up from
- Valid Credit Card that matches the address and name of the person who is signing up
- Uploaded Copy of a Picture copy of the Photo Identification/Govt ID (front and back)
- Description of the type of outbound calls the customer will be placing.

We do not accept calls that are placed through a Robo Dialer or outbound blast calling. All outbound calls must be dialed by a human and be for the normal course of legal business.

Once provided by the customer, this information is validated via our Customer Service/Account Verification team (normally within the same Business Day) for processing, and we reply once the customer's account has been verified. We also use a 3rd Party Verification system that lets us pull information for the company based on the EIN to verify the information provided is accurate.

Until customers provide the required information and we vet it, we do not allow inbound or outbound calls from the customers on our platforms.

Know Your Upstream Providers

In accordance with the Commission's directive in Advanced Methods to Target and Eliminate Unlawful Robocalls 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 (Rel. May 19, 2023) 49-51, Fourteen IP Inc provides the following information concerning its upstream voice service carrier.

Fourteen IP Inc has three main upstream providers from which it receives voice traffic:

1) Bandwidth.com
 900 Main Campus Drive
 Suite 100
 Raleigh NC 27606
 Stephen Thayer
voicesecurity@bandwidth.com

2) Inteliquent/Sinch
 550 W. Adams St.
 Suite 900
 Chicago IL 60661
 Stacy Graham
stacy.graham@sinch.com

3) Infobip LLC
 111 Town Square Place
 Suite 830

Jersey City NJ 07310
Christian Martinez
Christian.Martinez@infobip.com

Fourteen IP Inc, has a master service agreement with Bandwidth.com and InfoBip. Inteliquent/Sinch and has received assurances in writing from their officials that it has, and will continue to, sign calls transmitted to Fourteen IP Inc, and will abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to Fourteen IP Inc. Fourteen IP Inc and its upstream providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Acceptable Use Policy ("AUP")

Fourteen IP Inc maintains an AUP that subscribers must agree to before being permitted to use Fourteen IP Inc software and services. Among other things, the AUP prohibits:

1) Use with LCR: Customer may not use the Service (as defined in the Terms and Conditions posted by Fourteen IP Inc from time to time at <https://www.clearlyip.com/legal>) with (or in connection with) a least cost router (or "LCR"), which Fourteen IP Inc will determine, in its reasonable discretion, based upon analysis of Customer's traffic patterns in the ordinary course of business.

2) Use with Auto-Dialer (or "Robo-Dialer"): Customer may not use the SIP Trunking Service with (or in connection with) an auto dialer (or "Robo-dialer"), which Provider will determine, in its reasonable discretion, based upon analysis of Customer's traffic patterns in the ordinary course of business.

3) If using "North America Domestic Call Path Subscription" Voice Service, the following restrictions and limitations also apply:

a. Standard Business Use: The Service is provided for Standard Business Use for a single company only. Fourteen IP Inc reserves the right to ensure that the Customer's use of the Service is consistent with Standard Business Use and otherwise complies with the Terms and Conditions. If Fourteen IP Inc determines that a customer is not using the Service for Standard Business Use for a single company, Fourteen IP Inc may, in addition to all other rights and remedies pursuant to the Terms and Conditions, notify Customer and allow Customer the opportunity to cure any such use within two (2) calendar days. Customer may cure by stopping any such use, buying more trunks in order to comply with Standard Business Use, or change Customer's use of the Service in any other way that is consistent with Standard Business Use. Additionally, Fourteen IP Inc reserves the right to in any combination (i) immediately terminate the Service, (ii) charge a minimum inappropriate use fee of CA\$500.00 and/or charge CA\$0.05 per minute for all calls made during such periods of prohibited use (plus applicable toll free and international charges), whichever is higher, to Customer's payment method of record, and (iii) all applicable termination fees described in these Terms and Conditions.

b. Not for Wholesale: The North America Domestic Call Path Subscription service is not to be used with any type of Softswitch or Call Router with the intention of feeding phone service from a service provider to their customers using their own Softswitch or Call Router in a wholesale/resale environment. This service is to be

registered to a single PBX/Phone System direct that belongs to a customer for their own internal use only. You are not to use any Trunking service for purchasing and porting the numbers out to another service provider. Fourteen IP Inc may determine, in its reasonable discretion, if Service is being purchased or used in violation of this provision, based upon analysis of Customer's traffic, purchase and cancellation patterns in the ordinary course of business. In addition to all other remedies that Fourteen IP Inc has listed as part of the terms listed in this agreement, Fourteen IP Inc has the right to assess a Port Out fee of up to \$50.00 per phone number that is being ported out of an account that Fourteen IP Inc has reasonably determined is being used for the resale of phone numbers.

Telephone Number Authorization

New subscribers placing outbound calls can only use Caller IDs which have been purchased through our platform or ones verified through automated-number-validation voice call.

Analytics for Monitoring Traffic

Fourteen IP Inc works to detect a calling pattern consistent with illegal robocalls. If such a call is detected, we will identify the party that is using our network to originate those calls and will take appropriate action. Taking appropriate action may include, but is not limited to, initiating a traceback investigation, verifying that the originating subscriber owns or is authorized to use the Caller ID number, and suspending or terminating the party's ability to originate calls on our network.

No third-party vendors are involved in deploying Fourteen IP Inc analytics.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, Fourteen IP Inc follows the defined procedures on investigating such subscribers.

The procedures established include but are not limited to:

- 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 strange behavior;
- verifying that the call originating path is valid; and
- contacting the subscriber to understand his or her particular use case and validate that the activity belongs to that subscriber.

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

Blocking

Fourteen IP Inc will promptly respond to Do Not Originate requests it receives from the ITG. Fourteen IP Inc has mechanisms to automatically block suspicious calls using internal analytics. If Fourteen IP Inc monitoring systems identify suspected robocalling patterns that are confirmed with further investigation, Fourteen IP Inc will take appropriate action which may include suspending or terminating the subscriber's use of Fourteen IP Inc network. Fourteen IP Inc will cooperate with investigative bodies (including providing a single point of contact to address traceback requests from law enforcement including state attorneys general offices),

with the FCC and/or the ITG, as well as documenting requests and actions taken in response thereto.

Fourteen IP Inc blocks calls that exceed a certain number of calls per mins/sec from a customer and blocks calls that are not using an authorized caller ID.

Fourteen IP Inc has a database of DNO numbers and can in real time add numbers to it.

Plan Updates

This plan and industry best practices must evolve to response to the dynamic nature of mitigating illegal robocalling. Fourteen IP Inc will monitor industry best practices and continuously improve our internal processes to ensure this plan and our system adapt to this ever-changing issue.

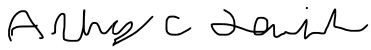
In the event of any change to this plan, Fourteen IP Inc will republish it to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10) business days of such update.

Certification of Anthony Lewis

I, Anthony Lewis, the President of Fourteen IP Inc, do hereby certify, under penalty of perjury, the following:

1. Fourteen IP Inc has fully implemented STIR/SHAKEN in the IP portions of its network.
2. Fourteen IP Inc's Business name and primary address are as follows:

Fourteen IP Inc
3255 W Highview Dr
Appleton WI 54914
3. Fourteen IP Inc has no other business names in use.
4. Fourteen IP Inc has not previously used any other business name.
5. 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.
6. Fourteen IP Inc's role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.
7. Fourteen IP Inc has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
8. Fourteen IP Inc is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
9. Fourteen IP Inc's Operator Code Number is 373M.



Anthony Lewis