Robocall Mitigation Plan

Midnight Technologies
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All customers of **Midnight Technologies** as a VoIP service provider are subject to the following rules regarding phone calls originating on the Trunks and DID's that are used on any system or device.

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)

Traceback

We respond 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.

Robocall Mitigation Program

We use software & services provided by White Label Communications to monitor our outbound voice traffic in real-time to prevent the origination of illegal robocalls. Combining behavioral analytics, caller authentication and verification, our solution features:

- No Outbound calls can show an outbound caller ID that differs from a phone number owned by the Customer.
- No excessive Dialing or short Dialing (less than 6 seconds) is allowed.
- No outbound Auto Dialers can be used without programming done by an **Midnight Technologies** Employee.
- Any traceback requests from the FCC, law enforcement, or the industry traceback consortium will have full cooperation from **Midnight Technologies** to stop or investigate illegal robocallers.
- Call Blocking Support: Accurate identification enabling subscribers 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 an override to include original caller ID even when a call is determined fraudulent.

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In addition, we have implemented a Call Abuse Policy and have published the following policy to our website, terms of use, and have notified our customers of the policy as copied below:

“Any call originated on the **Midnight Technologies** 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 the **Midnight Technologies** 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.”