

Qwality Tel, Inc Mitigation Policy

- 1) Qwality Tel, Inc complies with all rules and regulations as set forth by the **Telephone Consumer Protection Act (47 U.S.C. § 227)**.
- 2) Qwality Tel, Inc. takes aggressive measures in combating ROBO Fraud and illegal activity by using several filtering tools; SOMOS Real Number System, US Telecom DNO list & YouMail Db Spam Block as calls traverse the network.
- 3) If Qwality Tel, Inc gets a traceback notice from the US Telecom ITG Industry Traceback Group of an illegal robocall, or fraudulent calling that is traversing the Qwality Tel, Inc. Network, we immediately trace the call and put a block of this activity.
- 4) Qwality Tel, Inc. performs Call Blocking of the calling number ANI of the specified phone number listed in each traceback as an appropriate measure for robocall mitigation.
- 5) Qwality Tel, Inc. then files with the Industry Traceback Group within 24 hours as required and set forth by the **FCC on 06/30/2023**, thereby also disclosing the source (Carrier) of the activity. Once the filing is complete, we then notify the offending carrier of the activity and issue a first warning as agreed upon and thereby demonstrated in the Qwality Tel, Inc. KYC (Know your customer) documentation
- 6) Qwality Tel, Inc. has designated a single point of contact to handle traceback requests and coordinate with all outside investigations.
- 7) Qwality Tel, Inc. takes especially cautious consideration of foreign sources sending auto-dialed traffic using USA +1 telephone numbers.
- 8) Qwality Tel, Inc. investigates any and all Auto Dialer activity to confirm that it does adhere to regulations as stipulated by the **Telephone Consumer Protection Act (47 U.S.C. § 227)**.
- 9) Qwality Tel, Inc. cooperates with all investigative bodies and stands ready to comply with all traceback requests by law enforcement agencies, the FCC, or the Industry Traceback Group, the official consortium designated to lead private traceback efforts.
- 10) The customer must respond to all Tracebacks issued by the ITG US Telecom Traceback unit within 24 hour period of time As stated, and agreed upon in the KYC, customers are subject to suspension and/or prompt termination. If a customer is found to be in violation of the rules as set forth by Qwality Tel, Inc. and/or **The FCC Telephone Consumer Protection Act (47 U.S.C. § 227)** and found sending calls that Qwality Tel, Inc. believe are illegal, they will forfeit confidentiality and their information will be shared with enforcers and industry partners.

Acceptable Use Policy (AUP)

The following outlines and details the vetting procedures, and additional RoboCall Mitigation that Qwality Tel, Inc. performs with all clients on the Qwality Tel, Inc. network.

Qwality Tel, Inc. finds that the performance of these steps are necessary to avoid originating illegal robocall or facilitating fraudulent traffic as part of its robocall mitigation program.

Suspension/Termination

- All customers originating traffic in violation of the FCC Trace Act, such as robocalls, calls impersonating Social Security, IRS, Law Enforcement or other government departments, and traversing the Qwality Tel, Inc. Network, will receive an initial violation warning.
- A second offense of this nature will constitute a suspension.
- Upon a consecutive third offense, the account will be suspended pending termination until a mitigation plan is in place.
- All tracebacks must be responded to immediately, and end-users that are non-compliant shall be removed from the network

If fraud or robocalling continues after notification, your account will then be terminated immediately and permanently.

Cooperation in Contracts

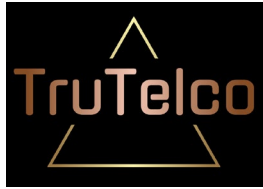
Qwality Tel, Inc. ensures clarity about the kind of traffic it will (and will not) accept from its customers with the issuance of the KYC (Know Your Customer) contract.

The KYC is an integral part of the vetting process and is used to confirm the legitimacy of prospective customers as well.

VETTING

2) Listed here are the necessary requirements as vetted by Qwality Tel, Inc. All requirement criteria below must be verifiable:

1. Business Location – must be verifiable
2. Federal Tax identification# - must be verifiable through IRS, FCC CORES, USAC
3. The customer has filed with the FCC and has been issued an FRN# - verifiable through CORES
4. The customer is registered with the FCC Cores and are registered in the IPR (Intermediate Provider Registry) – verifiable through
5. The customer has applied with the USAC and has been issued a 499a ID # verifiable with FCC 499 filer database and is current - Verifiable
6. The customer is registered with the FCC in the RMD and has filed a RMD (Robocall Mitigation Plan) – Verifiable through CORES



7. Fully Stir/Shaken – Verifiable as listed in the RMD (Robocall Mitigation Database)

8. The customer must respond to all Tracebacks issued by the ITG US Telecom Traceback unit within 24 hour period of time As stated, and agreed upon in the KYC, customers are subject to suspension and/or prompt termination. If a customer is found to be in violation of the rules as set forth by Qwality Tel, Inc. and/or **The FCC Telephone Consumer Protection Act (47 U.S.C. § 227)** and found sending calls that Qwality Tel, Inc. believe are illegal, they will forfeit confidentiality and their information will be shared with enforcers and industry partners.