



Morse Communications, Inc. Robocall Mitigation Plan

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 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

Our numbers are provided by Sinch (Inteliquent) and Bandwidth.com exclusively. All calls originating from our platforms are routed specifically to the respective carrier partner along with attestation rating via our STIR/SHAKEN certificates exchange which is signed by Transunion (Neustar). There is no number pollution over the dedicated SIP trunks to the respective carrier partner. Therefore, we are not eligible for the STIR/SHAKEN implementation extension received under 47 CFR § 64.6304. Through our partner providers, we have taken steps to mitigate any illegal, fraudulent and abusive calls and have created an Acceptable Use Policy as part of our end user agreements.

All the voice traffic that originates on our network is subject to the robocall mitigation program described below.

Robocall Mitigation Program

1. Morse Communications, Inc. is a reseller of Akabis, LLC.
2. We have registered with the STI-PA Transunion (Neustar) using our OCN 242K.
3. We perform the following roles in the call chain:
A voice service provider with a STIR/SHAKEN implementation obligation serving end-users.
4. We do not have a history of enforcement actions for illegal robocalls, TCPA or TSR violations, or related state law violations.
5. Through our wholesale service provider Akabis, LLC we use policies provided by their peers **Sinch (Inteliquent) (RMD0002029) and Bandwidth.com(RMD0003709)** to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls. Morse Communications is also leveraging Akabis, LLC Certified Caller Platform provided by Transunion (Neustar), for signing of our origination traffic using attestation ratings via STIR/SHAKEN certificate signed by Transunion (Neustar).

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.



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In addition, we have implemented a Call Abuse Policy 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 Morse Communications, 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 Morse Communications, Inc. 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."