

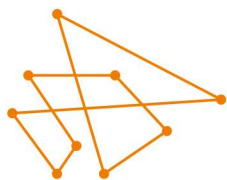


apelbycommunications

PRODUCTS AND SERVICES FOR ICT

Robocall Mitigation Plan

Apelby GmbH



apelbycommunications



Apelby GmbH is a non-US voice service provider providing telecommunications services to its customers globally but as a transit carrier is not originating nor terminating calls in its network. Even though Apelby is not obliged to implement the STIR/SHAKEN, we are keen to help fighting against any frauds by constantly implementing measures that can prevent from such activity.

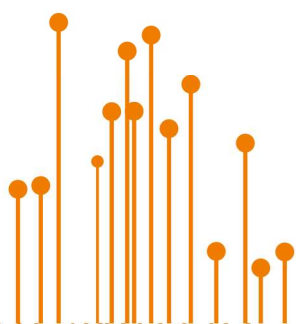
Apelby has blocked all the traffic coming from +1 A numbers to +1 B numbers by default and will not change this setting with exception of customers sending their pure retail voice traffic only, while meeting the condition of being registered in the Robocall Mitigation Database.

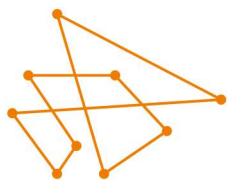
In case the Customer is not registered in the Robocall Mitigation Database, Apelby is blocking +1 originated traffic from such Customer automatically. Business Support team performs regular checks of the specific customers' registration in the Robocall Mitigation Database prior allowing traffic coming from such customers. New partner onboarding process includes the same checks as part of Apelby's due diligence in case the potential partner is originating or terminating traffic from +1 origin and such partner is also requested to comply with FCC regulations.

By using combination of in-house tools and third-party system, Apelby is able to detect various traffic abnormalities including fraudulent traffic patterns based on a specific set of rules. The system triggers immediate alert and preventively blocks such traffic until further analyzed and validated by the technical support team.

Apelby is also using tools for A number validation in order to prevent receiving traffic from invalid A numbers. Such tool is still in constant development in order to be 100% effective.

Our development team is constantly working on improving the tools that can help prevent any kind of fraudulent traffic trying to reach our network and Apelby management will make such measures effective without undue delays.





apelbycommunications



In case Apelby is requested to respond to a traceback request, such request is usually handled immediately so Apelby commits to respond fully and within 24 hours to all traceback request from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping illegal robocallers that use its service to originate, carry, or process illegal robocalls.

