



TOLY DIGITAL NETWORKS, INC. ROBOCALL MITIGATION PLAN





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Robocall Mitigation Plan Overview

In accordance with the rules and regulations of the Federal Communications Commission (“FCC” or “Commission”), the following Robocall Mitigation Plan details the policies and practices that Toly Digital Networks, Inc. (“Toly”) has established to avoid originating illegal robocall traffic and avoid carrying or processing illegal robocall traffic.

This Robocall Mitigation Plan provides information on Toly’s policies and procedures for:

1. Customer onboarding / know your customer (“KYC”);
2. Implementation of appropriate contractual terms;
3. Investigating suspicious calling
4. Analyzing and monitoring outbound network traffic;
5. Implementing industry robocall mitigation standards
6. Cooperating in traceback requests;
7. Designating an employee responsible for addressing robocall mitigation-related issues; and
8. Training of personnel.

Company Overview

Toly Digital Networks, Inc. (“Toly”) is a Florida corporation headquartered in Jupiter Florida and has been in business for over 30 years. The company is registered with the Federal Communications Commission (“FCC”) and is registered with the FRN/CORESID number 0004344990 and 499 Filer ID Number of 820904. Toly is a telecommunications provider serving both wholesale customers and business retail customers. Toly offers a wide range of communications solutions.

Toly is also a non-gateway intermediate provider (referred to throughout this Robocall Mitigation Plan as a “transit provider”). Toly is a company that carries and processes traffic which traverses the Public Switched Telephone Network (“PSTN”) however Toly also does originate and terminate traffic. Therefore, the company has a STIR/SHAKEN obligation which it has fully implemented. Toly is not a foreign voice service providers.

- Toly provides voice service to various types of business customers across its Internet Protocol (“IP”) network(s).
- These services include local and long-distance service packages. Toly also provides Voice over Internet Protocol (“VoIP”) services for commercial customers, which includes soft switching technology, IP commercial telephones, and unified messaging.



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- In its capacity as a retail service provider of VoIP calling Toly originates and terminates calls.
- In its capacity as a wholesale transit provider (Toll Reseller), Toly neither originates nor terminates voice traffic and relies entirely on its IP and TDM networks.

The company has in-house training focused on making sure all personnel is educated on issues related to the company policies and procedures related to the company's Robocall Mitigation Plan, from both a technical and commercial perspective in order to combat illegal robocalls. Amongst other things the requisite company personnel will also have access to a copy of this Robocall Mitigation Plan to review.

The Company Primary Place of Business

1005 W Indiantown Road
Jupiter, Florida 33458
561-694-8655
www.tolydigital.net

Officers and Directors:

CEO

Name: Aaron Suto
Address: 1005 W Indiantown Road
City, State, Zip: Jupiter, Florida 33458
Phone: 561-694-8655
Email: aaron.suto@tolydigital.net

COO

Name: Mark Suto
Address: 1005 W Indiantown Road
City, State, Zip: Jupiter, Florida 33458
Phone: 561-694-8655
Email: mark.suto@tolydigital.net



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Designated Robocall Mitigation Database Contact

Name: Mark Suto

Address: 1005 W Indiantown Road

City, State, Zip: Jupiter, Florida 33458

Phone: 561-694-8655

Email: mark.suto@tolydigital.net

STIR/SHAKEN Obligation

When traffic originates on the company network it is subject to the robocall mitigation program as defined in this document and is one hundred percent (100%) STIR/SHAKEN compliant in partnership with TransNexus as the STI- Certificate Authority (STI-CA) service provider for the Company.

Additionally, the company network will support call termination services for its customers where the company is not originating the call but passing the call over its networks/partners via SIP to ensure that the company, its partners and customers maintain all parameters of STIR/SHAKEN obligation information in the SIP messaging (header and IP portion of the call). This is also part of all new customer verification and testing prior to implementing services.

RMD Certifications

As certified in the RMD:

- All calls that Toly originate on its network are subject to this Robocall Mitigation Plan.
- All calls that Toly carries or processes on its network are subject to this Robocall Mitigation Plan.
- No prior Toly certification has been removed by FCC action and Toly has not been prohibited from filing in the Robocall Mitigation Database (RMD).
- At no time in the prior two years, has Toly been the subject of any formal Commission investigation, law enforcement action, or regulatory agency action or investigation. The company has never been found by any regulatory body or governing agency of any suspected or actual wrongdoing due related to transmitting, assisting, encouraging or otherwise supporting illegal calling of any kind; including robocalls, spoofing or spoofing, or a deficient RMD certification or mitigation program description.



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Elements of the Company's Robocall Mitigation Plan

The Company's Robocall Mitigation Plan contains the following elements:

1. Customer Onboarding and Know Your Customer Protocols
2. Terms and Conditions of Agreements
3. Analyzing and Monitoring Network Traffic
4. Investigating Suspicious Calling Patterns
5. Industry Traceback Group
6. Anti-Robocalling Principles
7. Designated Employee Responsible for Addressing Robocall Mitigation-Related Issues

Know Your Customer Protocols

Consistent with 47 C.F.R. §64.1200(n)(4), Toly has effective measures in order to prevent new and renewing customers from using its network to originate illegal calls. These measurements include all parameters of Know Your Customer ("KYC") and exercising due diligence in ensuring that its services are not used to originate illegal traffic. Most if not all of the company's customers have been long-term customers for more than three (3) years. The company does add new customers on a discretionary basis and has an in-depth customer intake and onboarding process.

In accordance with Principle #5 of the Attorney Generals anti-robocall principles, Toly follows and has implemented appropriate KYC protocols when onboarding new commercial customers. Company follows 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>)

As part of its KYC procedures, Toly requires any commercial customer to provide sufficient information to ensure its legitimacy. Amongst other things the customer is required to provide the full legal name of the company (and its parent company if applicable), its FEIN number, the physical address of its operations, and when different the billing name and address, and the customer contact name and telephone number, as applicable.

Toly's onboarding for its commercial customers also includes a service application be signed by the customer and/or that the customer may be required to execute a Master Service Agreement ("MSA") with Toly. Either of the aforementioned documents which the customer executes with the company states that the company requires a possible deposit or advance payment which may be required. The deposit or advanced payment is used as a condition precedent to the establishment of any service. The company also has the sole discretion to reject any commercial client that the company does not feel comfortable with.

Toly customers are fully informed fully of the Toly Terms and Conditions which clearly state



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that the services provided by Toly are not to be used for any unlawful purpose and that if and when a customer is found to have violated any term or condition of the Toly Terms and Conditions or Master Service Agreement (“MSA”) that the company has the sole right at its discretion to terminate customers for violations of the law.

For commercial customers, the Toly service application and MSA also includes a termination clause which the company can enact and enforce at any time with or without cause if and when any Toly customer violates any federal, state, and local laws, rules, and regulations applicable to use of Toly’s services or if Toly provides any equipment to the customer in order to operate their service.

Toly also retains such rights to immediately suspend, halt, modify or terminate service for violations if the customer violates the Toly Acceptable User Policy (AUP), which prohibits “using (Toly’s services) to transmit, distribute, retransmit, post, or store any material that is fraudulent, threatening, defamatory, libelous, or otherwise objectionable or unlawful”

For its commercial customers, Toly also reserves the right to discontinue service without notice, “in the event of a violation of any law, rule, or regulation of any government authority having jurisdiction over the service,” or in the event of fraudulent use of Toly’s network. In such instances, Consolidated will discontinue service without notice and/or seek legal recourse to recover all costs involved in enforcement.

The company’s standard Master Services Agreement (“MSA”) prohibits parties from deliberately replacing, implementing or deploying any procedure within its switch that generates or may generate an incorrect ANI, CPN or other SS7 parameters than those associated with the originating End User. The agreements also require cooperation with all traceback requests from the FCC’s designated Traceback Consortium.

The Toly MSA also prohibits the signatory from tampering with equipment or software to falsify caller ID by data or voice.

The MSA as signed by the Toly customer also contains provisions in it that are designed to mitigate illegal robocalls over IP networks. Such provisions enable Toly to take any actions it may deem necessary in the event it has reason to believe and/or discovers that suspicious or fraudulent calls are being made or where it identifies calling patterns or volumes that do not seem consistent with the customer's regular usage patterns. In such instances, Toly can temporarily suspend the services of the customer, and/or block or limit access to particular calling numbers or geographic areas to prevent illegal robocalls.

Additionally, Toly may suspend or terminate service to a customer if the company reasonably believes the customer or entities using a customer’s account are using the services in a manner that is “abusive, illegal, or fraudulent.” Customers are contractually bound not to use Toly’s services in a manner that unreasonably interferes with the use of the services by other customers.



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Analyzing and Monitoring Network Traffic

Toly has policies and procedures that govern the analysis and monitoring of its outbound network traffic. Consistent with Principle #3 of the “Anti- Robocall Principles for Voice Service Providers,” Toly analyzes voice network traffic originating from its network on a twenty-four-hour basis in order to identify and monitor patterns consistent with illegal robocalls.

In its capacity as an originating voice service provider and a non-gateway intermediate provider, Toly has selected the following third-party vendors for a variety of traffic analysis and robocall mitigation purposes such as TransNexus software to monitor the company’s outbound voice traffic to identify and prevent the potential origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts company staff if the company network appears to originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation.

If and when any suspicious activity is detected the company staff immediately investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If the company staff determines that the caller was attempting to originate unlawful robocalls, a representative of the Toly team will immediately terminate the call service and inform the commercial customer or wholesaler as appropriate. Additionally, Toly is able to block calls from carriers that are not listed in the FCC’s Robocall Mitigation Database.

The Company utilizes a combination of internal tools and third-party solutions to check for Do Not Originate (DNO) numbers. In addition, the Company utilizes a combination of internal tools and third-party solutions to detect invalid phone number formats, area codes and unassigned number blocks. The Company also utilizes data analytics to detect and investigate irregular and unexpected calling patterns, originating number use against customer profiles.

Further, the company provides its customers with tools when receiving inbound calls to utilize STIR/SHAKEN information (or lack thereof), as well as other filters to help identify and/or screen potential robocalls.

Toly is ever diligent in working on solutions to expand on its call blocking capabilities to further prevent illegal robocalls from reaching its end-user customers. Toly also has its own customer designed systems in place which detect and mitigate suspect traffic. These systems can terminate any call that is in progress if Toly staff detect any suspicious activity.



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Participation in the Industry Traceback Group

Toly takes the issue of unwanted and illegal robocalls very seriously and is dedicated to always ensure that its network is not utilized for the origination of any illegal calls. In accordance with the Industry Traceback Group's ("ITG") written policies and procedures, and consistent with the FCC's rules and regulations, the will respond fully, within 24 hours, to all call traceback requests from the ITG, the FCC or any other governmental agency when the company receives any inquiry or notification and will take immediate steps. Further the company will cooperate with the aforementioned governing or regulatory organizations in investigating and immediately putting a stop to any illegal robocallers that use its service to process, originate, or carry calls.

The company is committed to cooperating with the Federal Communications Commission (FCC), law enforcement, and the industry traceback consortium in investigating and stopping any illegal robo-callers that it learns are using our service to originate calls or transit calls into the United States and territories.

The Company commits to fully responding within 24 hours to all traceback requests from the ITG, the TPTG, the FCC, and law enforcement. The Company shall cooperate with these groups to investigate and stop any illegal robo-callers from using the Company's service to carry or process illegal calls.

When notified by the FCC's Enforcement Bureau, Company shall block and report identified illegal traffic, and any substantially similar traffic, on an ongoing basis when Company receives actual written notice of such traffic from the Enforcement Bureau. Company shall provide the Enforcement Bureau with an explanation as to why Company reasonably concluded that the identified traffic is not illegal, and what steps it took to reach that conclusion.



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Upstream Providers

Toly operates with multiple upstream providers to facilitate all voice traffic originating from or terminating to the Toly network. The relationships between Toly and its upstream providers have strong contractual terms.

Many of Toly's upstream providers are Tier-1 providers, or are in other cases, nationwide companies that Toly understands are adhering to the requirements put forth by the FCC to mitigate illegal robocalls. Listed below are two of Toly's primary upstream providers.

1. Infobip f/k/a/ Peerless Networks
433 W. Van Buren Street, Suite 410S
Chicago, Illinois 60607
Email: support@peerlessnetwork.com
Phone: 888-380-2721

2. Bandwidth.com
2230 Bandmate Way
Raleigh, NC 27607
Email: team@bandwidth.com
Phone: 855-290-8135

Ongoing Robocall Mitigation

The company monitors and examines call detail records (CDRs) on a repeating basis to detect suspicious call activity and/or calling patterns. When the company, or its Upstream Providers detects network usage patterns consistent with illegal robocalls or suspects illegal robocalling is taking place, the company will immediately seek to identify the party that is originating, terminating, or routing these calls and take appropriate action.

The actions taken may include, but are not limited to, initiating a traceback investigation; verifying that the originating customer owns or is authorized to use the Caller ID number; determining whether the Caller ID name sent to a receiving party matches the customer's corporate and/or d/b/a name; blocking the party's ability to originate, terminate, or route calls on the network; and/or providing notice to law enforcement authorities.

As part of Company plan to continue to mitigate and prevent any originating robocalls, the company is committed to early identification and investigation of possible robocalling conditions. Among other things, with the tools and resources the company employs these tools have watches and alarm sets for higher-than-normal subscriber traffic volume, including large



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bursts of traffic in small timeframes or spikes in usage. With the tools provided to the Company by its underlying provider, the company also monitors for originating calls classified as high volume short duration (“HVSD”), tracks for low call completion percentages, and/or originating calls with sequential called-to-number dialing patterns.

Company Declaration

The Company certifies that it has never been under investigation or committed any violations within the last two years with any local, state, or Federal agency or equivalent related to telemarketing or robocalling. Additionally, the Company is not currently subject to a formal action or investigation due to suspected unlawful robocalling or spoofing.

If when and as the Company business may change designated Company representatives only will update this RMP as appropriate.