



COEO SOLUTIONS ROBO MITIGATION PROGRAM

About Coeo Solutions

Since the Company inception our products and services have evolved from basic VoIP telephony and calling into a full cloud-based, enterprise-class Unified Communications, and Contact Center solutions provider supporting small, medium and enterprise businesses. Coeo supports business customers in a wide range of industries and does not resell products or services to other resellers.

As a Company, Coeo Solutions provides premier and best in class telephony products and services. This includes but is not limited to:

1. SIP Trunking (integrated with MS TEAMS, Office 365, Webex Calling / UCM, Zoom (BYOC), and other third-party applications),
2. UCaaS cloud-based phone systems that deliver solutions for Office, Work from home, Contact Centers and SMS Text and Video Conferencing in one business tool.
3. Multiple SDWAN and networking solutions for businesses within a single state and/or businesses nationwide.
4. Custom designed telephony systems and services specifically structured for a Coeo Solutions business client.
5. Managed Services which offer a business customer full office support related to all aspects of their technology infrastructure.

The Company is an industry leader offering unique products and services that continue to meet the critical needs of its existing clients and acquiring new ones rapidly by designing, developing and deploying premier products and services.

Coeo Solutions is based in “State of the Art” offices in Schaumburg, Illinois.

1. IPES OCN

The Company IPES OCN is: **697J**

2. Coeo Solutions Main Address & Contact Information

1900 E Golf Rd, STE 550
Schaumburg, IL 60173
1-844-300-COEO (2636)
1-312-940-7821
www.coeosolutions.com

3. Company 499 Filer ID & FRN Information

Coeo Solutions 499 Filer ID: 830571
Coeo Solutions FRN/CORES ID - 0023870223



4. Officers and Directors

CEO

Frank Ruffolo
Schaumburg, IL 60173
312-940-2220
fruffolo@coeosolutions.com

CFO

Pete Shah
Schaumburg, IL 60173
312-940-2217
pshah@coeosolutions.com

VP Operations:

Tony Maritato
Schaumburg, IL 60173
312-940-2214
tmaritato@coeosolutions.com

Regulatory Oversight Contact:

Kevin Orofino
Schaumburg, IL 60173
312-940-7829
kevin@coeosolutions.com

Dedicated

Robocall Mitigation & STIR/SHAKEN Contact:

Kevin Orofino
Schaumburg, IL 60173
312-940-7829
kevin@coeosolutions.com

Coeo STIR/SHAKEN

Coeo has implemented the STIR/SHAKEN protocol by deploying IDHUB services with Ribbon Communications (2021) being driven by the North American Numbering Council and the ATIS STI-GA Technical Committee, which is assisting in the SHAKEN implementation.

Coeo Solutions has specific procedures and technology in place to combat fraudulent calling using telephone numbers assigned to Coeo Solutions. The overall objective is to identify and block illegal/fraudulent calling, while allowing legal calls to be completed.

One of the many procedures which we have in place as part of our core plan is to generate a list of telephone numbers that are "ANI- blocked" in its voice routing eco-system which includes rules in the Coeo network and that of their upstream "trusted" partner carriers.



This list is compiled from various sources that identify telephone numbers which generate a high number of complaints from consumers, including sources from the Federal Trade Commission, Internal Revenue Service, Federal Bureau of Investigation, internal complaints, and Nomorobo. As a result of this procedure, calls that are generated from telephone numbers on this “ANI-blocked” list will be blocked from completing through the Coeo network.

Upstream Carriers

As noted above, presently the Company provides its services to direct end user business and enterprise customers. The Company has its own switch and sound relationships with iConectiv, Ribbon Communications and its underlying upstream carriers who are:

- i. InfoBip (a/k/a Peerless Network)
Chicago, IL 60673
Phone: +1 888-380-2721
www.peerlessnetwork.com
- ii. Sinch (a/k/a Inteliquent)
Chicago, IL 60606
Phone: +1 844-84-SINCH
www.sinch.com
- iii. Bandwidth.com
Raleigh, NC 27607
Phone: +1 800-808-5150
www.bandwidth.com

The Company is designated as a Non-gateway Intermediate service provider and does carry a very small percentage of customer traffic that does not originate on the Coeo network which will traverse to the public switched telephone network. The Company can authenticate the calling party’s relationship with the caller ID ascribed to a given call. The Company’s network is able to accept and therefore accurately transmit all STIR/SHAKEN-related data it receives in the call path. Additionally for outbound calls which are received from known customer telephone numbers which originate on the Coeo network, we sign those calls with all STIR/SHAKEN guidelines as identified in past and current FCC orders.

Know Your Customer

Coeo Solutions secures the following information from each customer prior to enabling services and performs validation checks on information provided (and specified below). Further the company has a rigorous Customer On-Boarding process whereby each customer is fully vetted.

- Full legal name of customer
- State/Province/Country of Business Incorporation
- Customer Federal Employer Identification Number (FEIN) or equivalent Federal tax ID



- Physical address representing a real place of business associated with the entity
 - Service/usage address information (Aloc – Zloc)
- Customer Website
- Name(s) of all individuals with 10% or more direct or indirect ownership of the entity
- Collection and validation of a contact email address with a domain name that exactly matches the entity website provided or a domain verified as controlled by the entity.
- Customers':
 - Parent company legal name(s) (if applicable)
 - State/province/country of business incorporation (if applicable)
- A description of the intended use of services
- The full set of products and services that will be enabled upon activation
- A certification of whether the entity or its owners have been subject to any prior enforcements or judgments for alleged illegal activity related to itself or related entities and, if so, provide details
- An active review of potentially negative reputational material including law enforcement actions, regulatory sanctions, or civil judgments
- A description of the calls to be made
- A description of consent collection practices
- A description of legal compliance practices, including Telephone Consumer Protection Act (TCPA), Truth in Caller ID Act, and Fair Debt Collection Practices Act (if applicable)

Coeo Solutions has a stringent Customer Acceptable Use Policy (“AUP”) relative to comprehensive Acceptable Use Policy related to robocalling, fraudulent calling patterns and High-Volume Short Duration (“HVSD”) calling. The company’s AUP specifically references that if and when the Coeo tech team has reason to suspect or believes that a customer is found to have violated and/or possibly violated the Company policy, the Company has the right to halt, suspend, cease services to the customer immediately.

ITG & Traceback Requests

Coeo Solutions, in accordance with the FCC’s regulations 47 C.F.R. § 64.6305(b)(2) and 47 C.F.R. § 64.1200(n)(1)(ii), is committed to responding to traceback requests from the Industry Traceback Consortium (“ITG”), the FCC, any division of a Federal and/or state government and Federal and/or State law enforcement agencies within 24 hours. Coeo Solutions will fully cooperate with any of governing regulators or agencies in order to investigate and prevent any bad actors from completing calls via the Coeo Solutions network.

Coeo Solutions is committed to replying to every inquiry from any U.S. Governmental agency and/or the International Traceback Group (“ITC”) Company staff will immediately review, and open investigation of any suspicious activity found by its monitoring systems or reported to the Company by customers or third parties (including the ITG), all federal, state, and local regulatory commissions, and all law enforcement agencies.

As mentioned above Coeo Solutions will respond to and shall use all best and reasonable business efforts to respond to any ITG inquiry or ticket (or any other legitimate governing state or regulatory body) within and less than twenty-four (24) hours.



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.

RMD Certification and Contact Updates

Coeo Solutions believes its efforts along with the technology the Company uses in its efforts to identify and block fraudulent/illegal calls, is the most current and applicable available. Coeo Solutions will continue to monitor its processes and technology to identify illegal calls and will update procedures and/or implement technological changes as necessary.

Company Declaration

The Company has not, nor has it ever been subject to any FCC Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.

Robocall Mitigation Plan Updates

As required by FCC guidelines and Order updates Coeo Solutions will submit all necessary updates to the Robocall Mitigation Database on the ServiceNow website along with all required plan updates within 10 business days of any order updates and/or in general terms with any material Company updates (change in management, contact information, address information and etc.). Updates will be signed by an officer of the company in conformity with 47 CFR 1.16.