



INTERNET



DATA CENTER

celito.net



VOICE



CONSULTING

Celito Communications Inc. - Robocall Mitigation Plan

- Celito Communications provides inbound and outbound calling services from our voice platform.
- Our terms and conditions that apply to all our voice customers stipulate that they must safeguard their usernames and passwords as well as the identifier of the equipment used to authenticate voice services on their account.
- Celito's voice customers are prohibited from autodialing, telemarketing, extensive call forwarding, activities involving continuous connectivity, fax or voicemail broadcasting, or any other activity that results in excessive usage inconsistent with normal business usage patterns.
- In addition, customers are prohibited from transmitting or receiving communication of any kind when receipt or possession of such communication would constitute, or encourage conduct that would constitute, a criminal offense, give rise to a civil liability or otherwise violate any applicable laws.
- Customers are explicitly prohibited from using the voice platform for any abusive or fraudulent purpose, including any way that would interfere with Celito's ability to provide voice services.
- If Celito determines that the voice platform is being used for any of the aforementioned activities, Celito will immediately terminate without notice or modify their services in order to stop the activity.
- To prevent and mitigate this activity, all our customers' voice devices and services are authenticated and monitored from the first day of service to prevent unauthorized devices and services from originating calls.
- Call limits are put in place to prevent large bursts of calls and high-duration calls.
- In addition, our voice platform automatically logs and rejects calls that are dialed with invalid or unallocated numbers.
- Celito Communications has implemented STIR/SHAKEN in partnership with Bandwidth as the STI-Certificate Authority (STI-CA) service provider. Bandwidth will interact with the STI-Policy Administrator (STI-PA) on Celito Communications' behalf to ensure that only vetted and approved customers are authorized to sign calls and such customers' calls are signed exclusively with certificates that have been issued by the national level.
- Finally, we have monitoring tools in place to detect large bursts of calls in a short timeframe and calls to high-risk rate centers. If Celito Communications identifies potentially fraudulent, abusive, suspicious, or robocalling traffic patterns we will act immediately to mitigate this activity. Mitigation includes, but is not limited to blocking or rejecting known fraudulent/abusive traffic or invalid calling numbers utilizing the appropriate Session Initiation Protocol (SIP) response codes, blacklisting a known abusive number, tracing the call traffic back to the originating party, reporting instances of irregular traffic activity to our customer, requiring the customer to remediate and detail the cause of said irregular traffic, and taking action such as suspension or termination for violations.