

TouchTone Communications Robocall Mitigation Plan **(Effective as of September 18, 2025)**

Company Information

TouchTone Communications, Inc.
3 Wing Drive, Suite 103
Cedar Knolls, NJ 07927

Operating Company Number (OCN): 683A

Company's Role in the Call Chain:

1. A Voice Service Provider with a STIR/SHAKEN implementation obligation serving end-users.
2. A Voice Service Provider with a STIR/SHAKEN obligation acting as a wholesale provider originating calls.
3. A Gateway Provider with a STIR/SHAKEN obligation.

TouchTone has many upstream carriers such as Verizon, AT&T, Lumen, and others.

Officer & Contact Information:

CEO & President	CFO & Executive Vice President	COO & Senior Vice President	RMD & STIR/SHAKEN Contact
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Overview

The FCC required that, by June 30, 2021, all voice service providers ("VSPs") certify in the Robocall Mitigation Database that they have implemented a Robocall Mitigation Plan ("RMP") to mitigate originating illegal robocalls. As a VSP, TouchTone Communications, Inc. ("TouchTone") is implementing Full STIR/SHAKEN protocols as well as implementing additional robocall mitigation. The FCC further required that even if a Provider has already submitted their certification and plan to the RMD, they must add additional required details to their RMP as of February 26, 2024. Those additional requirements are included within this updated Robocall Mitigation Plan as of February 26, 2024.

TouchTone has developed a Robocall Mitigation Plan that demonstrates a full commitment (at all levels within the Company) to comply with the FCC Order and requirements that demonstrate how the Company will:

- Respond to traceback requests and to cooperate with investigators with the intent to stop illegal robocalls.
- Respond to all requests from federal, state and local regulatory commissions as well as civil and criminal law enforcement.
- Details the reasonable steps taken to avoid originating illegal robocalls.
- Is registered and filed in the FCC Robocall Mitigation Database and is registered and filed in the FCC Reassigned Number Database and files monthly updates of disconnected numbers.
- Follows all FCC guidelines relevant to "Know Your Customer"; and,
- implements Full STIR/SHAKEN protocols.

The FCC states that a RMP is sufficient if the detailed practices in the plan can reasonably be expected to significantly reduce the origination of illegal robocalls and the VSP complies with the practices it describes in its filing.

Purpose

TouchTone is dedicated to stopping illegal calls from originating on our network and monitoring the calls coming into our network. This document contains all details related to TouchTone's Robocall Mitigation Plan.

Responding to Traceback Requests & Investigating Suspicious Activity

TouchTone is a member of the USTelecom Industry Traceback Group ("ITG") and actively works with USTelecom's recommended best industry practices and cooperates with all ITG traceback investigations. To allow for prompt and comprehensive responses, TouchTone has allocated dedicated resources to provide quick and complete responses to traceback requests. When in receipt from any Federal, or governing regulatory agency and/or the ITG; TouchTone will respond to all traceback requests in 24 hours or less.

When traffic analysis indicates the presence of likely illegal robocalling, our Network Operations Center is alerted which follows the defined procedures on investigating such customers. The procedures we have established include, without limitation, checking and validating:

- Recent and past call detail records and benchmark against expected trends.
- Recent and past account activity; and,
- Contacting the customer to understand their particular use of service and validate that the activity belongs to that specific customer directly.

Our Company does not and will not deal with any Carrier Customer who is not listed in the Robocall Mitigation Database and we are committed to making all best efforts to secure that if and when a Carrier Customer is de-listed from the RMD we will take steps to immediately halt, suspend and/or terminate passing their traffic and further yet, may possibly terminate the customer.

TouchTone will investigate suspicious activity found by its monitoring systems or reported to TouchTone by customers or third parties, including the ITG, all federal, state, and local regulatory commissions, and all civil and criminal law enforcement.

Blocking Suspicious or Illegal Traffic

TouchTone currently subscribes to the ITG Do Not Originate Database and will implement Do Not Originate requests it receives from the ITG. TouchTone currently blocks all calls from all numbers included in the ITG DNO Database. If TouchTone's monitoring systems identify suspected robocalling patterns that are confirmed after further investigation, TouchTone will take appropriate action.

Such action may include blocking, suspending, or terminating the customer's use of TouchTone's network. TouchTone will cooperate with all inquiries from third parties to address traceback requests from the ITG, law enforcement, State Attorney's General Offices, and the FCC, and will document requests & actions taken in response to inquiries and again, will promptly reply within 24 hours or less to any inquiry.

Robocall Mitigation Database & Updates

TouchTone will maintain participation in the FCC Robocall Mitigation Database ("RMD") and will update and maintain a current Robocall Mitigation Plan. This plan and industry best practices will change in response to the changing protocols and requirements being put in place to stop illegal robocalling. TouchTone will monitor industry best practices and continuously update our processes to ensure this plan and our systems adapt to any changes in protocols or requirements.

Reassigned Number Database & Monthly Updates

TouchTone is currently registered with the FCC Reassigned Number Database ("RND") and is actively updating all disconnected numbers on a monthly basis per the FCC requirements.

Know Your Customer

Pursuant to the guidelines and requirements set forth by the FCC, it is an essential part of STIR/SHAKEN that all VSPs "Know Your Customer". In accordance with this requirement, TouchTone has implemented and follows a number of detailed processes and procedures to ensure we have accurate and current information regarding all of our customers. This includes, and without limitation to, the items below.

- **Obtain Full Customer Documentation:** Service Agreements, RespOrg, LOA, Credit Application, Know Your Customer, STIR/SHAKEN LOA, Invoice Copies, and additional documentation from:
- **Retail Enterprise Customers:** Verify the corporate entity, FEIN, Tax status and overall business model including the intended use of TouchTone services.
- **Wholesale Carriers & Vendors:** Verify participation in STIR/SHAKEN and/or that they have a Robocall Mitigation Plan in place and are registered in the FCC Robocall Mitigation Database (RMD). Obtain all appropriate agreements and documentation as outlined above.
- **Use of Services:** Verify and validate customers' intended use of TouchTone services regarding intended calling practices and volumes. All customers are bound by the TouchTone Acceptable Use Policy.

Full STIR/SHAKEN Implementation

Per the guidelines and requirements set forth by the FCC, TouchTone has deployed a Full STIR/SHAKEN Implementation across TouchTone's network as required.

Any TouchTone customer with a STIR/SHAKEN implementation obligation will be required to (1) make all attestation level decisions, consistent with the STIR/SHAKEN technical standards; and (2) ensure that all calls are signed using its own certificate obtained from a STIR/SHAKEN Certificate Authority—not the certificate of a third party or TouchTone's.

All other TouchTone customer calls across our network are authenticated based on the criteria set forth by the FCC below.

- A-Level Attestation (Full)
 - A trusted customer/subscriber on the TouchTone network that has the right to use this number. All numbers provided by TouchTone to a trusted subscriber will be signed with an A-Level Attestation token.
 - If the trusted customer/subscriber has numbers from other VSP's that will route through the TouchTone network these calls will be signed with a "B" token. If the trusted customer/subscriber provides and signs TouchTone's "Know Your Customer Form" and TouchTone's "STIR/SHAKEN LOA" indicating the customer's intent and certification that they are authorized to certify and attest to these numbers, then TouchTone will sign these calls with an "A" token.
- B-Level Attestation (Partial)
 - A trusted customer/subscriber on the TouchTone network using a number not provided by TouchTone or certified by the customer/subscriber.
- C-Level Attestation (Gateway)
 - TouchTone can only confirm the call originated from their network, or was received through an external gateway, without further details on the call source, TouchTone will sign these calls with a "C" token.

Where TouchTone acts as an intermediate carrier, calls will be passed with the attestation token as received if calls are received without an attestation token TouchTone will attest those calls with a "C" level attestation. In the event that TouchTone is unable to validate and/or authenticate a call in any manner, that call is immediately blocked from our network.

Official Actions Against or Investigations Against Company Regarding Unlawful Robocalling or Spoofing

Per the specific requirements in the FCC order that state:

1. There is no restriction for the carrier to file this plan; and,
2. That the carrier has not (within the last 2 years) been subject to any investigation or official action related to illegal robocalling, spoofing and etc.; TouchTone attests to the following,

TouchTone Communications is not barred or restricted in any way from the filing of this Robocall Mitigation Plan. Additionally, TouchTone has not had; nor been subject to any official action against or investigation against our company regarding unlawful robocalling or spoofing from any third party, without limitation: any form of investigation from the ITG, FCC, FTC, State Attorney's General Offices, or State or Local Law Enforcement Agencies at any point, including within the last 2 years.