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Robocall Mitigation Program

This Robocall Mitigation Plan describes the specific reasonable steps that Pathway Com-Tel, Inc. (Pathway) has taken to avoid the origination, carrying, or processing of illegal robocall traffic on its network.

Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Robocalls

Pathway has a “know-your-customer” policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. Prior to a new business customer ever making a call on Pathway’s network, we personally know, or get to know, the business owners and/or management. This personal touch gives Pathway a clear view of whether or not the business is a risk of originating illegal robocalls.

Although Pathway’s customers generally do not generate a high volume of calls, were we to receive a request for high-volume origination services, we would exercise caution and extensively investigate such customers before granting access to the services. Specifically, we would collect information such as the business’s physical business location, contact person(s), state or country of incorporation, federal tax ID, and the general nature of their business.

In addition, Pathway sends a welcome packet to its new and renewing customers with access to the Company’s Terms and Conditions, which addresses any unlawful use of their lines. Were Pathway to determine that a customer was originating unlawful calls on our network, we would suspend their service immediately.

“Know-Your-Upstream Provider” Procedures

Most of the connections that Pathway has with upstream providers have been in place for many years, and we know these companies very well. (Pathway’s primary immediate upstream provider is AT&T.) However, Pathway exercises due diligence before accepting traffic from any new upstream provider as we seek to ensure that such providers are not using Pathway to carry or process a high volume of illegal traffic. Specifically, Pathway collects information such as the upstream provider’s physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of their business.

Use of Call Analytics Systems

Pathway uses call analytics software provided by TransNexus to monitor all outbound voice traffic in real-time to prevent the origination or transit of illegal robocalls. The software provides

detailed reporting to identify suspected illegal robocalls. The system alerts us if we process outbound calls where the calling phone number is invalid, unallocated, or on a Do Not Originate list; has a poor reputation; or is in the FCC consumer complaint database. Pathway performs the same mitigation steps for all outbound calls regardless of our role in the call chain for a particular call. We immediately investigate any identified suspicious calls to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls. If Pathway determines that the traffic was likely unlawful, then we warn them to stop sending such traffic. If they continue to send traffic that appears to be unlawful, then we terminate their service.

Commitment to Respond to Traceback Requests

Pathway commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its services to originate, carry, or process illegal robocalls.