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Robocall Mitigation Plan

This mitigation plan is submitted on behalf of Network Brokers Corp. ("Network Brokers Corp."), an Interconnected VoIP Provider serving other wholesale carriers.

Network Brokers Corp. is partnering with digitalpvoice (dba: Prescott-Martini) RMD0004985 to implement STIR/SHAKEN in parts of its network in which it may do so and has implemented this policy for those portions of its network not compliant. Network Brokers Corp. passively processes any STIR/SHAKEN tokens received from its' customers.

We perform the following roles in the call chain:

1. We are a Voice Service Provider without a STIR/SHAKEN obligation acting as a wholesale provider originating calls.
2. digitalpvoice, Inc (dba: Prescott-Martini) provides our SPC and signs all calls originated on our network on our behalf.

digitalpvoice (dba: Prescott-Martini)
P.O. Box 2219
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Stephen Matlock
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928-474-4444

Network Brokers Corp. has not been prohibited from filing a certification in the Robocall Mitigation Database.

Network Brokers Corp. does not have a history of enforcement actions for illegal robocalls, TCPA or TSR violations, or related state law violations.

Network Brokers Corp. uses the following affirmative, effective measures to prevent the origination or transit of illegal robocalls.

Know Your Customer

Network Brokers Corp. utilizes the administrative mitigation technique of "Know Your Customer." Network Brokers Corp. is a small, long established provider that maintains a close relationship with its subscribers. Its customers are generally other Interconnected VoIP providers and wholesale call centers customers. We make sure we have detailed identifying information regarding each customer, including legal name, officer name, street address and phone/email contact points, web site, IP addresses and USAC 499a filer ID (if appropriate). Gmail addresses are not acceptable. We are working to collect corporate EIN details for all accounts. Generally, foreign carriers are not permitted unless they have registered with this database.



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Network Brokers Corp. has a screening process for new customers requesting service at or above large volume calling capability levels:

- We will not deploy large volume calling capability at an address shown in the company records as being residential
- New business requesting large volume calling capability must provide a tax ID and verification as to the nature of the business
- We verify identity data provided by the customer to look for inconsistent information

Network Brokers Corp. will block any Interconnected VoIP provider who is not registered in the Robocall Mitigation Database after September 28, 2021. Network Brokers Corp. can provide a subscription-based, legal robocalling product including Ringless Voice Mail and we educate any subscribers or potential subscribers (such churches, school systems and the like) regarding legal versus illegal robocalling activities to verify they are informed of their compliance obligations in their use of the product.

General Prohibition Against Illegal Robocalling

Network Brokers Corp.'s customer services are subject to restrictions contained in its End User License Agreement or Master Services Agreement.

Its' existing Terms of Service("TOS") prohibit activities normally associated with Illegal Robocalling including, but not limited to:

- 1) providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call.
- 2) violating any applicable local, state, or federal law; using the Network Brokers Corp. service to engage in or in connection with fraudulent activities.
- 3) In addition, the company is updating its TOS to expressly reference the prohibition on robocalling and all current subscribers will receive notice of the publication of its updated TOS.

Network Brokers Corp.'s users are notified that Network Brokers Corp may take action up to suspension or termination of service for violation of the TOS without advance notice.

Network Monitoring

Network Brokers Corp. has deployed multiple levels of technical discovery and prevention to monitor against suspicious calling activities including high call volumes, excessive short duration calling and high volumes of non-completed calls. Call monitoring is continuous and automated and a report of suspected calls is produced daily for review.

Network Brokers Corp. subscribes to the "Do Not Originate" list containing over 1 million verified numbers including governmental and private sector entities which would not be expected to transit



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our network. Any match of a customer call with the DNO list is blocked. This list is regularly updated.

Call patterns that are flagged as suspicious are either automatically actionable or reviewed by a designated employee and are addressed by a combination of implementation of real time monitoring, contacting the customer and review unusual calling patterns. Such patterns include Cellular caller ID's, non-conforming caller ID's and calls to numbers on the federal Do Not Call list ("DNC"). If Network Brokers Corp. cannot satisfactorily resolve the reason for the flagged traffic, or fails to get cooperation from the end user, it will implement without notice mitigation activities including suspension / reduction / termination of service.

Traceback, Enforcement and Industry Cooperation

Network Brokers Corp. actively participates in the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG). Network Brokers Corp. has dedicated sufficient resources to provide prompt and complete responses to traceback requests.

Network Brokers Corp. actively attends several industry events and conferences annually, either in person or via video conference to further educate ourselves and our colleagues on continuing developments in the battle against illegal robocalling.

Any questions or inquiries regarding this plan can be addressed to:

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