

Socket Telecom, LLC
STIR/SHAKEN Implementation and Robocall Mitigation Program

STIR/SHAKEN Extension

Socket Telecom, LLC ("Socket") has implemented STIR/SHAKEN throughout its network to authenticate caller ID information, guaranteeing the verification of call origins. Socket has contracted with Sansay to be its STIR/SHAKEN provider for authenticating and tagging calls in compliance with Commission standards. Socket also utilizes in-house analytics to detect suspicious incoming call patterns as well as for Socket mitigation program, described below.

Socket cooperates with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that it learns are using Socket's service to originate calls. Socket has a commitment to respond to traceback requests within 24 hours of receiving a valid request.

Socket Telecom, LLC ("Socket") has implemented a robocall mitigation program to combat the origination of illegal robocalls. Socket certifies that all calls that originate on Socket's network will be subject to Socket's robocall mitigation program described as follows:

- Socket will engage in subscriber vetting to review new subscribers to determine those likely to engage in robocalling. To do this, Socket will collect and verify information for each commercial customer such as physical business location, contact person(s), state or country of incorporation, federal tax ID, and the nature of the customer's business.
- Socket will require customer assistance in traceback investigations through contractual obligations.
- Socket has developed analytical tools to perform Call Duration Record ("CDR") analytics. These tools perform a CDR review to identify:
 - Subscribers originating suspiciously high volumes of short duration calls
 - Subscribers with high volumes of low call completion rates
 - Subscribers with intermittent bursts in the volume of outbound calls
 - Subscribers originating high volumes of international calls into high-fraud areas
- In the event suspicious activity is detected, Socket will halt a customer's ability to make new calls and suspend service once illegal robocalling is suspected.
- Socket has inquired into becoming a member of the Industry Traceback Group and intends to become a member.