

PenTeleData Robocall Mitigation Plan

As part of its Robocall Mitigation Database filing required under the FCC's *Sixth Caller ID Authentication Report and Order* (Sixth Report and Order and Further Notice of Proposed Rulemaking, FCC 23018 (Mar. 17, 2023)), this document describes PenTeleData's certifications and robocall mitigation plan to detect and prevent unlawful robocalls from originating on its network.

1. PenTeleData's Corporate Information

PenTeleData Limited Partnership I ("PTD") is a Pennsylvania Corporation. Its primary address is provided within the Robocall Mitigation Database ("RMD"). PTD is a reseller of VoIP services provided by Alianza, Inc. ("Alianza"). PTD white labels the Alianza solutions and invoices PTD customers directly under the PTD name. As a reseller, PTD relies on Alianza for much of its robocall mitigation procedures.

Alianza is a reputable provider that maintains its own filing in the RMD. In that filing, Alianza certifies it has not been prohibited from filing in the RMD and Alianza has not been subject to any Commission, law enforcement, or regulatory agency action or investigation arising from

2. STIR/SHAKEN Certification

As a reseller, PTD's customers use Alianza's network. Alianza certifies that all voice traffic originating on its network is authenticated in compliance with applicable standards under 47 CFR §64.6301.

3. Know-Your-Upstream-Provider Procedures

Alianza has existing agreements with Tier-1 carrier service providers from which it facilitates the provision of carrier services to PTD. Alianza has confirmed that each of those carriers are listed in the RMD. Alianza has provided PTD with detailed onboarding and fraud detection guidance to require and enable us to comply with our obligations to prevent and mitigate illegal robocalling.

4. Know-Your-Customer Procedures

PTD works with each customer to identify the proper business voice solution for the customer's business. This allows PTD to vet its customers and provide them with an individualized solution designed to appropriately meet their business needs.

5. Contractual Terms and Other Conditions

PTD customers are required to abide by PTD's terms of service and conditions contained within its contracts. Additionally, Alianza's customer agreements contain fair use and protection policies that allow Alianza to immediately terminate any services to any subscriber or device to prevent automated call blasting, mass calling events, and other fraudulent or illegal activity. Alianza agreements with its underlying carrier service providers also include provisions requiring the parties' compliance with applicable robocall prevention and mitigation standards.

6. Fraud Detection and Mitigation

Alianza has implemented a proprietary fraud detection and mitigation process through which it analyzes high-volume network traffic to evaluate compliance with a variety of fraud detection indicators and fraud prevention best practices. Through this fraud detection and mitigation process, Alianza then notifies individual customers, like PTD, of potentially fraudulent activity occurring in any of our

subscriber accounts. Alianza may take remedial action against any subscriber's account to prevent or remediate robocalling or other fraudulent activity. If Alianza takes any such action, its fraud detection system triggers notification to the customer of that action and any remedial steps that may be taken to restore service.

7. Enforcement

Alianza promptly responds to all traceback requests from FCC, law enforcement, and the Industry Traceback Group. Alianza also cooperates with those entities and with its carrier partners to investigate and prevent any illegal robocallers from using Alianza's services to originate calls. Alianza employees engage directly with PTD to suspend or disable subscriber accounts identified as originating unlawful robocalls through Alianza's network.