

This document describes TALKTONE, INC 's robocall mitigation program as it relates to those obligations set out in the Sixth Report and Order and Further Notice of Proposed Rulemaking issue by the Federal Communications Commission (FCC).

Our company is a enterprise which creates, maintains, and makes available for distribution, mobile telephony software. TALKTONE, INC's products are available for download from both the iOS and Android app stores. The applications provide a convenient and cost-effective solution for individual users making and receiving mobile VOIP calls

Voice Service Provider Classification

TALKTONE,INC does not provide any network infrastructure associated with its applications and instead relies on a CLEC partner to act as the Voice Service Provider. TALKTONE,INC's CLEC partner initiates, carries, and terminates all voice traffic on TALKTONE,INC's applications.

For these reasons, TALKTONE,INC itself does not have an obligation to implement STIR/SHAKEN as of present and relies upon its CLEC partner to leverage STIR/SHAKEN protocols to authenticate Voice traffic on TALKTONE,INC's applications.

To TALKTONE,INC's knowledge, our CLEC partners have completed STIR/SHAKEN integration and have reported relevant information in the Robocall Mitigation Database.

Robocall Mitigation Plan

TALKTONE, INC's applications, by design, do not lend themselves to robocalling implementations. TALKTONE, INC has not exposed any APIs or SDK which can be leveraged for a robocalling solution. All calls need to be initiated by the app running on an Android or iOS device. Furthermore, account owners cannot hold more than one active call at a time.

We take affirmative, effective measures to prevent new and returning

customers from originating illegal calls. These measures include investigating all suspicious activities related to Voice traffic on our applications.

We have implemented a call analytics system which monitors inbound/outbound call ratios and which can identify suspicious calling patterns including but not limited to sequential dialing, outgoing calls with high intensity within a specific time slot, .

User accounts exhibiting suspicious calling patterns are immediately flagged and automatic action can be taken to deactivate the account and thereby prevent their ability to make or receive Voice calls on the relevant our application.

TALKTONE, INC proactively applies anti-fraud measures in addition to the anti-fraud measures, performed by our U.S.-based CLEC partner.

We will deactivate accounts if any fraudulent or abusive activities are reported. Upon account deactivation, the user will no longer be able to make use of our services provisioned to the account.

We can blacklist callee numbers which have elected to no longer receive calls from phone numbers held by users of our products. And we also provide mobile users with the ability to easily block calls from our mobile applications.

“Know-Your-Upstream Provider” Procedures

As described above, TALKTONE, INC does not provide any network infrastructure associated with its applications and instead relies on a CLEC partner to act as the Voice Service Provider. Our CLEC partner initiates, carries, and terminates all Voice traffic on our applications. TALKTONE,INC is not a gateway provider. Our CLEC partners deploy STIR/SHAKEN protocols to authenticate the traffic from our applications.

Inbound calls to our product users, from all voice service providers, will traverse through our CLEC partner’s network, and thereby be

subjected to the CLEC's robocall mitigation plan, as well as those measures undertaken by us.

Traceback Participation

TALKTONE, INC will participate fully and quickly in all legal requests for voice call tracebacks needed to combat robocalling, pursuant to the TRACED Act, and other applicable laws and regulations.

TALKTONE,INC certifies that it has not been prohibited from filing in the Robocall Mitigation Database at any time.

TALKTONE,INC certifies that it is not subject to an FCC, law enforcement or regulatory investigation related to robocalling.