

## Robocall Mitigation Plan -- Global Telecom Brokers

This robocall mitigation plan is for VDL, Inc. DBA Global Telecom Brokers, with headquarters at 500 Redland Court, Suite 309, Owings Mills, Maryland 21117.

We perform the following role in the call chain:

- A voice service provider with a STIR/SHAKEN implementation obligation serving end-users.

Global Telecom Brokers has not been prohibited from filing a certification in the Robocall Mitigation Database.

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

Global Telecom Brokers uses the following affirmative, effective measures to prevent the origination or transit of illegal robocalls:

### Know Your Upstream Provider

We have a vetting and review process for upstream providers, that is, providers that send us voice traffic that we terminate or transit to other providers.

We confirm that the upstream provider has a certification in the Robocall Mitigation Database. We will not accept voice traffic from an unregistered provider.

We require that upstream providers have a reasonable robocall mitigation plan, including a vetting process for their customers and upstream providers, and use call analytics to identify suspicious traffic.

Our contractual provisions with upstream providers prohibit them from sending us illegal robocalls. If we find that an upstream provider is sending us suspicious robocalls, we warn them to stop. If such traffic continues, then we terminate their service.

### Traceback

We respond within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium. We cooperate fully with such entities in investigating and stopping any illegal robocallers that use our service to originate, carry, or process illegal robocalls.

### Robocall Mitigation Program

We use 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 number has a poor reputation or is invalid, unallocated, or on a Do Not Originate list.

We perform 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 we determine 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.

#### STIR/SHAKEN

We have registered with the STI-PA using OCN 4492. We have our own STIR/SHAKEN certificate issued by the TransNexus Certification Authority (STI-CA) that we use when authenticating calls we originate. We have implemented a STIR/SHAKEN solution supplied by TransNexus.