

Atlantech Online, Inc.
Robocall Mitigation Plan

Introduction

This document details the reasonable steps and actions taken by Atlantech Online, Inc. (“Atlantech”) to mitigate and eliminate illegal robocalling. Atlantech has an ongoing commitment to scan for and help alleviate illegal robocalling by pre-qualifying prospective customers, monitoring existing customers for traffic patterns indicative of prohibited robocalls, and working with other providers and regulatory agencies in combatting fraudulent voice activity.

Atlantech provides originating and terminating voice calling services. All calls that originate on our network are subject to the robocall mitigation program. Atlantech uses a third-party vendor to sign our calls, and we do have our own Token.

Know Your Upstream Providers

Atlantech exclusively partners with reputable, large upstream providers (tier 1) to deliver phone calls for our customers. To ensure full transparency and compliance with the FCC regulations, we have established robust procedures to know our upstream providers:

- **Due Diligence:** Before entering into partnerships with upstream providers, we conduct a thorough due diligence process. This process includes reviewing their credentials, certifications, and compliance with industry standards and regulations.
- **Contractual Agreements:** We maintain written contractual agreements with our upstream providers, clearly outlining their obligations to comply with all applicable regulations and maintain the integrity of the telephone services they provide on our behalf.
- **Regular Audits:** We perform periodic audits of our upstream providers to ensure ongoing compliance with FCC regulations and the STIR/SHAKEN rules. These audits assess their adherence to best practices in call authentication and verification processes.

In addition to the above procedures, we also maintain open lines of communication with our upstream providers to stay informed about any changes in their practices or technologies that may have an impact on our services and compliance measures. Atlantech and its upstream providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Know Your Customer

At Atlantech Online, we take our obligation to know our customers very seriously. As part of our sales qualification process, our sales representatives engage in direct communication with potential customers. During these conversations, we diligently gather essential information to ensure a comprehensive understanding of the customer's telephone service requirements. The information collected includes but is not limited to:

- Telephone service requirements: We inquire about the specific phone service needs of the customer, such as the number of lines, desired features, and any other special requirements.
- Employee count and locations: We request details on the number of employees the customer has and their geographical locations. This helps us tailor our services to meet their individual needs effectively.
- Type of business: Understanding the nature of the customer's business allows us to customize our solutions to align with their industry-specific demands and compliance requirements.

In our research of the prospect, Atlantech will not activate clients that provide anonymous information or where data mismatches are found. Additionally, prospects are required to agree to Atlantech's strict policies and contractual terms prohibiting the act of fraudulent voice activity as a condition of doing business with Atlantech.

Individuals associated with prospects or current customers who have been known to act improperly or otherwise be involved in fraudulent robocalling will cause their companies to be rejected by Atlantech as a customer and any existing customer relationships could potentially be severed.

Traceback Requests

Atlantech is committed and will respond fully within 24 hours to all Traceback Requests from the FCC, law enforcement agencies, and the industry traceback consortium and vows to cooperate with these agencies in investigating and stopping any illegal robocallers that use our service to make calls. Atlantech uses Oracle's OCOM software to monitor call flow. We log call flow across our network for 40 days. Atlantech devotes sufficient resources to provide prompt and complete information to traceback requests. Our point of contact to handle all traceback requests is:

Jeff Pipitone

Mgr. Voice Services

voiceservices@atlantech.net

If a traceback exposes an existing customer as the source of fraudulent robocalls, or as having transmitted fraudulent robocalls, a demand for an explanation and verification of mitigation of the traffic is issued to the customer. If the fraudulent traffic is not remediated, Atlantech immediately begins rejecting all traffic from the offending customer.

Telephone Numbers

A Telephone Number (“TN”) based caller identity is the originating phone number included in call signaling used to identify the caller for screening purposes that is uniquely associated with the subscriber. A subscriber is permitted to use a TN as a caller identity if a TN is directly managed by Atlantech and/or obtained by Atlantech from Atlantech’s carrier partner for use by the subscriber. Numbers can also be allocated by Atlantech or ported using information from previous bill matching customer information.

For subscribers with multi-line telephone systems, Atlantech and our carrier partners only allow calls to be connected if the originating number matches one of the TN’s assigned to the subscriber. This screening capability enables an automated and secure method of validating originating telephone numbers.

International Calling

Atlantech is not currently an international voice services provider. If at any time Atlantech does decide to sell our services to international customers using North American Numbering Plan resources, we will familiarize ourselves with and develop best practices for full vetting of such customers and work with our carrier partners to perform the necessary telephone number validation on all international originated calls.

Call Analytics

We use Transnexus Fraud Control analytics to detect and block suspected illegal traffic (based on risk and volume). We use TrueSPAM to detect and notify and/or block traffic with poor source reputation.

Ongoing Robocall Mitigation

Atlantech vets all our direct Origination service providers to confirm they are registered with the Robocall Mitigation Database. We periodically check the RMD to confirm that our Origination service providers are registered. We use Transnexus Fraud Control to block known illegal traffic.

Atlantech also monitors and examines call detail records (CDRs) on frequently to detect suspicious call activity and/or calling patterns. When we detect network usage patterns consistent with illegal robocalls or suspect illegal robocalling is taking place, we will immediately seek to identify the party that is originating, terminating, or routing these calls so that we may take appropriate action. The actions taken may include, but are not limited to initiating a traceback investigation; verifying that the originating customer owns or is authorized to use the Caller ID number;

determining whether the Caller ID name sent to a receiving party matches the customer's corporate and/or d/b/a name; block the party's ability to originate, terminate, or route calls on the network; and/or providing notice to law enforcement authorities.

As part of our Plan to mitigate and prevent any originating robocalls, we are committed to early identification and investigation of possible robocalling conditions. Among other things, we watch for higher than normal subscriber traffic volume, including large bursts of traffic in small timeframes or spikes in usage. We also monitor for originating calls of short duration and low call completion percentages, originating calls with sequential called to number dialing patterns.

We believe that our commitment to knowing our customers and diligently vetting our upstream providers underscores our dedication to maintaining the highest standards of service integrity and regulatory compliance. As the STIR/SHAKEN rules continue to evolve, we remain dedicated to staying abreast of any changes and adapting our procedures accordingly.

Atlantech Contact for Robocall Mitigation-Related Issues

Please direct any questions related to Robocall Mitigation issues to:

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