

Huntleigh Technology Group, Inc.

Robocall Mitigation Plan

2/26/2014

Version 2.0

1. Preventing Customers from Originating Robocalls

We do not have any wholesale customers. All customers are local businesses in our region. We know all our customers and their business model and do not knowingly allow any customers to use any type of dialers etc. that could be used to facilitate illegal robocalls. Many of our customers also use us for either contract or a la carte MSP services and PBX maintenance services. All new contracts/service agreements state specifically that we can terminate their service immediately upon identifying any type of outbound illegal robocalling.

We also use our downstream provider (Voip Innovations) to monitor all of our traffic and provide CDR analysis to assist in identifying daily call volumes for our traffic. This includes but is not limited to DID analysis and the cumulative amount of traffic for each customer broken down by DID/CallerID. This allows us to identify quickly any anomalies/changes to customer inbound or outbound traffic patterns.

They also provide us with weekly short call report for every rate deck that we have with them and a daily report if we exceed 10% of the days call volume for number of short calls. This gives a quick indication of any problem areas. On top of that we are penalized strongly if we do not stay below the required level of short volume calls.

Our internal databases are also used to further analyze our CDRs to identify any traffic leaving our network that might show any anomalies compared to normal traffic volumes.

We also agree to assist in any Traceback requests on a 24 hour basis to identify the source of any outbound traffic that might be identified as illegal robo traffic.

We will immediately follow all Mandatory blocking following Commission Notification.

2. Inbound Traffic

For inbound traffic, we rely on our Downstream provider (Voip Innovations) to mark calls that we can then block on a customer basis on an opt-out basis. They also assist in tracking down the source of Spam and DOS types of calls.

3. Additional Enhancements to our Robocall Compliance Toolbox

We are in the process of adding additional Robocall Mitigation applications provided by our STIR/SHAKEN provider (Trans-Nexus) to include their SHAKEN PASSporT, Inbound Shield and Reputation services to improve both inbound and outbound compliance measures. As they come on-line, we will update our Robocall Mitigation plan within 10 days as required.

4. Know-Your-Upstream-Provider

We have only one provider, (Voip Innovations) and they provide us with both inbound and outbound traffic services. We do not allow any traffic that transits our network. We also do not allow any wholesale customers who could possibly transit our network without our knowledge.

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