

GTC, INC.

ROBOCALL MITIGATION PLAN

GTC, Inc (GTC) is complete STIR SHAKEN compliant. All GTC customers are served on the GTC IP network which relies on technology that can initiate, maintain, carry, process, and terminate SIP calls.

GTC has implemented the following robocall mitigation plan to detect and prevent unlawful robocalls from originating on its network. All calls that originate on GTC's network are subject to the described robocall mitigation plan.

Robocall Mitigation Plan

GTC has contracted with JSI, LLC for its Robocall Origination Detection Service. JSI downloads GTC's CDRs and checks for patterns indicative of originating robocalls. JSI provides GTC a report identifying the suspected illegal robocall activity for investigation.

If it is determined a GTC customer is originating prohibited unlawful robocalls on our network, GTC will either warn the customer to stop or terminate their service as allowed per GTC's policy.

Upstream Provider Knowledge

GTC knows all the carriers from which it receives traffic and has confirmed that all of the carriers are listed in the Robocall Mitigation Database. GTC monitors incoming traffic from all connected carriers for suspicious call patterns indicative of illegal robocall activity, notifies the upstream carriers of any such traffic and warns the carriers that if the traffic does not cease, the calls may be blocked from entering GTC's network. In addition, GTC is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.

Know Your Customer

GTC has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. GTC thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services.

Traceback

GTC commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to originate calls. GTC commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within twenty-four (24) hours.