



## Gateway Telnet, Inc.

### Robocall Mitigation Plan

This robocall mitigation plan is for Gateway Telnet, Inc., with headquarters at 9729 Belmar Ave., Northridge, CA 91329.

We perform the following roles in the call chain:

- A voice service provider with a STIR/SHAKEN implementation obligation serving end-users.
- We also utilize Skyswitch (RMD0002940) and Telinta Hosted VoIP platforms and resell those services.
- Our next hop carriers are Bandwidth.com and Telnyx.

Gateway Telnet, Inc., has not been prohibited from filing a certification in the Robocall Mitigation Database.

Gateway Telnet, Inc., does not have a history of enforcement actions for illegal robocalls, TCPA or TSR violations, or related state law violations.

Gateway Telnet, Inc., uses the following affirmative, effective measures to prevent the origination or transit of illegal robocalls.

#### Know Your Customer

We follow the caller ID authentication best practices for vetting caller identity and operational legitimacy for new and existing customers as described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

This process includes the collection and review of entity-identifying information to confirm that we have an authenticated relationship with the customer. We use this authenticated information to determine whether the customer is subject to any enforcement actions that restrict the type of calling that they may do, for example, if they have been banned from initiating telemarketing calls.

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We also validate, when possible, that the entity has a legitimate right to use its asserted calling numbers. We use this information to support the attestation level we assign to calls that we originate for that customer.

Our contractual provisions with customers prohibit them from initiating illegal robocalls. If we find a customer initiating 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 will use call analytics software provided by Telonium to monitor all outbound voice traffic in real-time to prevent the origination or transit of illegal robocalls when our implementation is complete.

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 immediately investigate any identified suspicious calls to determine if the caller attempted 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.

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## STIR/SHAKEN

We have registered with the STI-PA using OCN 578L. We have our own STIR/SHAKEN certificate issued by the Telonium Certification Authority (STI-CA) that we use when authenticating calls we originate. Bandwidth(RMD0003709) and Telnyx(RMD0001645) sign our calls with our Certificate on our behalf.

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