

Creative Business Solutions, LLC dba PC Solutions

Robocall Mitigation Plan

Introduction

This document details the reasonable steps and actions taken by Creative Business Solutions, LLC dba PC Solutions ("PC Solutions") to mitigate and eliminate illegal robocalling. PC Solutions 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.

PC Solutions provides interconnected Voice over Internet Protocol ("VoIP") calling services. All telecom services are provided on a resale-only basis. As a telecom reseller, PC Solutions is dependent on our underlying provider's assistance with monitoring their networks for fraudulent voice calling patterns. Our underlying VoIP providers are CoreDial, LLC and White Label Communications, LLC.

Know Your Underlying Provider

Creative Business Solutions, LLC dba PC Solutions has a master service agreement with CoreDial, LLC and White Label Communications, LLC and has received written assurances from their officials that it has and will continue to sign calls submitted to Creative Business Solutions, LLC dba PC Solutions and will abide by the FCC's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice services to PC Solutions. PC Solutions 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

PC Solutions is a small business to business company and we spend 30-60 days getting to know potential clients. This process includes meetings, on-site visits, meeting executives and researching customer needs. We ask for current invoices for internet and telecom services to confirm their usage. We do not work with call centers and focus on professional and medical offices.

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

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 PC Solutions as a customer and any existing customer relationships could potentially be severed.

Traceback Requests

PC Solutions 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. PC Solutions will devote sufficient resources to provide prompt and complete information to traceback requests. Our point of contact to handle all traceback requests is:

Falina Marihart
CFO
(559) 825-3201

John Marihart
CEO
(559) 825-3205

Upon receiving a Traceback request, we will immediately notify and forward it to our underlying providers. We follow up as needed to ensure the request is being handled by our vendor partners.

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, PC Solutions 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 PC Solutions and/or obtained by PC Solutions from PC Solutions’ underlying carrier for use by the subscriber. Numbers can also be allocated by PC Solutions or ported using information from previous bill matching customer information.

For subscribers with multi-line telephone systems, PC Solutions and our underlying provider 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

PC Solutions is not currently an international voice services provider. If at any time PC Solutions 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 underlying provider to perform the necessary telephone number validation on all international originated calls.

Call Analytics

As a reseller, PC Solutions must rely on our underlying provider and/or their third-party vendors to determine if originating calls should be blocked based on call analytics practices. In our efforts, PC Solutions monitors our monthly invoice and broadband usage to see any spikes in usage and will question them if spikes are seen.

Ongoing Robocall Mitigation

PC Solutions monitors and examines call detail records (CDRs) on a repeating basis to detect suspicious call activity and/or calling patterns. If we suspect or are notified of illegal traffic, we will notify the customer and our underlying providers. We will temporarily suspend the customer's account until we have researched and resolved the situation. If the customer needs access to telecom service, we can provide a temporary solution until we know the outcome. If the customer is generating illegal calls, we will cancel service and report it to the 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.

PC Solutions Contact for Robocall Mitigation-Related Issues

Please direct any questions related to Robocall Mitigation issues to:

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