

ROBOCALL MITIGATION PLAN

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Robocall Mitigation

The FCC mandated a Robocall mitigation program under 47 CFR § 64.6305 "Robocall mitigation and certification." The program took effect on June 30, 2021, and has been updated in accordance with changes to the FCC rules.

Approval and Ownership

The VP of Cloud Operations is the owner of this document.

Enforcement

Any personnel found to have violated any policy or process shall be subject to disciplinary action, up to and including termination of employment.

1.0 Subject to a Robocall Mitigation Program

All of the calls originated by the Customers are subject to a robocall mitigation program. By accepting Zultys's terms and conditions, the Customer agrees to participate in the robocall mitigation program, provide required information about its business entity, commit to responding to requests to trace suspect calls and cooperate in investigating and stopping illegal robocallers.

Zultys is a registered service provider in the STI-GA. All calls originated by a Zultys' customer are subject to the STIR/SHAKEN authentication framework and the appropriate attestation is attached.

1.1 Vetting Customer Entity and Identity (Know Your Customer Procedures)

All new customers are subject to a detailed Know Your Customer process that involves verifying the Customer's information provided in the signed Zultys Service Agreement to confirm the Customer's identity.

1.2 Telephone Number Authorization/Validation

The Customer's system should be provisioned to originate calls from valid phone numbers only. Phone number is considered valid if it is legally owned by Customer or assigned to Customer by any entity owned this phone number. Zultys reserve a right to validate caller IDs using in the outbound calls and block calls with unauthorized Caller ID Zultys can request proof of ownership for phone numbers used as a Caller ID. Phone numbers allocated by Zultys or ported to Zultys are considered authorized and do not require additional validation.

1.3 Measures to Prevent or Avoid the Origination of Illegal Robocalls

1.3.1 Monitoring

Zultys utilizes analytics technologies to monitor traffic on the network to identify potentially unlawful call origination activity. Illegal call originators are being recognized by examining Call Detail Records to identify such activity as intermittent bursts of high activity, suspiciously low call completion rates/short call times, and evidence of systematic calling, or "war dialing."

1.3.2 Investigation of Suspicious Activity

Zultys will investigate potentially unlawful call origination activity and decide what action to take for remediation. This action may include immediate call blocking and notification to the Customer to stop the illegal calling. The Customer agrees to respond within 12 hours to our requests to provide information regarding the unlawful activity and the traceback requests Zultys may receive from the upstream carriers.

1.3.3 Call blocking and service cancellation

If a Customer doesn't respond to Zultys within 12 hours or refuses to collaborate to remediate the unlawful call activity, the Customer's behavior will be considered a material breach of Zultys's terms and conditions. In this case, Zultys will exercise its right to Disconnect and Cancel Service as per chapter 11 of the terms and conditions.

1.4 Traceback Requests

Zultys will respond fully within 24 hours to all traceback requests from the FCC, law enforcement and the Industry Traceback Group and commits to cooperate those entities in investigating and stopping any illegal robocallers that use its service to originate calls.