



Robocall Mitigation Plan

Workable Programs and Systems, Inc. provides retail Dedicated Internet Access (DIA) and other retail IP based networking products and Voice over Internet Protocol (VoIP) calling services. All telecom services are provided on a resale-only basis. As a telecom reseller, Workable Programs and Systems is dependent on our underlying provider for the monitoring of their network for fraudulent voice calling patterns. Our underlying VoIP provider is AT&T.

All customers using Workable Programs and Systems, Inc. as a VoIP service reseller are subject to the following rules regarding phone calls Originating on the Trunks and DID's that are used on any system or device.

- No Outbound calls can Originate without Caller ID from the main line the call originates from.

- No excessive Dialing or short Dialing (less than 6 second) is allowed.

- No Outbound Auto Dialers can be used without programming done by AT&T Employee.

- Any traceback requests from the FCC, law enforcement or industry traceback consortium will have full cooperation from Workable Programs and Systems, Inc. and AT&T, it's VoIP service provider, to stop or investigate illegal robocallers.

Robocalling Found

If calls are found to be made on a customer's equipment using AT&T's VoIP services, Workable Programs and Systems, Inc. will initiate and create a ticket with AT&T.

A 24/7 phone number 580-332-6601 will allow anyone to call in to stop robocalls or to open a new investigation.

Know Your Underlying Provider

Workable Programs and Systems, Inc. has a master service agreement with AT&T and looks to AT&T that it has and will continue to abide by the FCC's STIR/SHAKEN and robocall mitigation rules in all respects when reselling voice services to Workable Programs and Systems. Workable Programs and Systems and AT&T have agreed to

work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Know Your Customer

Workable Programs and Systems performs a physical location validation check using AT&T's Facilities Check online tool.

In our research of the prospect, Workable Programs and Systems will not activate clients that provide anonymous information or where data mismatches are found.

Traceback Requests

Workable Programs and Systems 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 AT&T's service to make said calls. Workable Programs and Systems will devote sufficient resources to provide prompt and complete information to traceback requests. Our point of contact to oversee all traceback requests is:

Workable Programs and Systems, Inc.
Lacey Krumholz, Operations Manager
580-332-6601

Upon calling our Operations Manager, an initial ticket will be opened with AT&T's Partner Exchange Support Group notifying AT&T of the Traceback Request and its associated information.

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 obtained by Workable Programs and Systems from AT&T for use by the subscriber. Numbers can also be ported using information from previous bill matching customer information.

Call Analytics

As a reseller, Workable Programs and Systems must rely on AT&T and/or their third-party vendors to determine if originating calls should be blocked based on call analytics practices. In our efforts, AT&T does monitor for calls to be sourced only from known locations and known DID's/TN's.

Ongoing Robocall Mitigation

Workable Programs and Systems relies on AT&T to monitor and examine call detail records (CDRs) on a repeating basis to detect suspicious call activity and/or calling patterns. When AT&T detects network usage patterns consistent with illegal robocalls or suspect illegal robocalling is taking place, AT&T will immediately seek to identify the party that is originating, terminating, or routing these calls so that we/AT&T may take appropriate action. The actions taken may include, but are not limited to opening a traceback investigation; verifying that the originating customer owns or is authorized to use the Caller ID number; determining whether the Caller ID name sent to a receiving party matches the customer's corporate and/or d/b/a name; block the party's ability to originate, terminate, or route calls on the network; and/or providing notice to law enforcement authorities.

As part of our Plan to mitigate and prevent any originating robocalls, we/AT&T are committed to early identification and investigation of possible robocalling conditions. Among other things, AT&T may watch for higher-than-normal subscriber traffic volume, including large bursts of traffic in small timeframes or spikes in usage. AT&T may also monitor for originating calls of short duration and low call completion percentages, originating calls with sequential called to number dialing patterns.

Workable Programs and Systems Contact for Robocall Mitigation-Related Issues

Please direct any questions related to Robocall Mitigation issues to:

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