



Robocall Mitigation Plan

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**Saddleback Communications Inc
ROBOCALL MITIGATION PLAN**

Saddleback Communications is an incumbent local exchange carrier (ILEC). Saddleback Communications serves the Salt River Pima Maricopa Indian Community. We provide traditional telephony and voice-over-Internet Protocol (VoIP) services. This Robocall Mitigation Plan describes the specific reasonable steps that Saddleback Communications has taken to avoid the origination, carrying, or processing of illegal robocall traffic on our network.

Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Calls

Saddleback Communications has a "know-your-customer" policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. Saddleback Communications undertakes various commercially reasonable precautions with business customers before entering into a formal written agreement as part of its onboarding process. All prospective business customers participate in an in-person or telephonic enrollment/contract process.

In addition, Saddleback Communications investigates the prospective business customer's background, taking steps such as checking for a company website, determining how long the business has been operating, and confirming their corporate status with the applicable website, along with other indications of a legally operating business. Saddleback Communications collects and as needed, verifies the following data on prospective business customers as part of its investigatory process.

- Physical business location
- Contact person(s)
- State or country of incorporation
- Federal tax ID number
- General nature of the business

In addition, were Saddleback Communications to receive a request for high-volume origination services, it would exercise caution and extensively investigate such customers before granting access to them. Furthermore, Saddleback Communications has an Acceptable Use Policy with provisions that allow us to suspend or terminate the services of a customer engaged in illegal robocalling or that is otherwise abusing our services.

“Know-Your-Upstream Provider” Procedures

Most of the connections that Saddleback Communications has with upstream providers have been in place for many years, and we know these companies very well. However, Saddleback Communications exercises due diligence before accepting traffic from any new upstream provider as we seek to ensure that such providers are not using us to carry or process a high volume of illegal traffic. Specifically, Saddleback Communications collects information such as the upstream provider’s physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of their business.

We have implemented Outbound Robocall reporting using ClearIP.

Use of Call Analytics Systems

Saddleback Communications is committed to keeping our network free of illegal robocalls. That is why we use advanced software from Redshift Networks to monitor all inbound and outbound voice traffic. The software provides detailed reporting that identifies suspected robocalls and highlights calls from an invalid or suspicious number.

We work closely with our customers to investigate flagged calls and take swift action against unlawful robocalls. If we determine that a caller is attempting to originate illegal robocalls, we will warn them to stop or terminate their service as appropriate.

Commitment to Respond to Traceback Requests

Saddleback Communications commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping illegal robocallers that use its service to originate, carry, or process illegal robocalls.