

Robocall Mitigation Plan

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Reinvent Telecom LLC ROBOCALL MITIGATION PLAN

Reinvent Telecom is a competitive local exchange carrier (CLEC) as well as a wholesale provider of voice over Internet Protocol (VoIP) service. This Robocall Mitigation Plan describes the specific reasonable steps that Reinvent Telecom 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

Reinvent Telecom has a "know-your-customer" policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. Reinvent Telecom 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, Reinvent Telecom 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. Reinvent Telecom 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 Reinvent Telecom to receive a request for high-volume origination services, it would exercise caution and extensively investigate such customers before granting access to them. Furthermore, Reinvent Telecom 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 of our services.

“Know-Your-Upstream Provider” Procedures

Most of the connections that Reinvent Telecom has with upstream providers have been in place for many years, and we know these companies very well. However, Reinvent Telecom 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, Reinvent Telecom 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.

Use of Call Analytics Systems

Reinvent Telecom 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 wholesale partners 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.

We have implemented Outbound Robocall reporting using ClearIP.

Commitment to Respond to Traceback Requests

Reinvent Telecom 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.