

Robocall Mitigation Plan

1. NTT Communications

NTT Communications Corporation (“NTTC”) is a foreign voice service provider organized and existing under the laws of Japan, which provides retail telecommunications. NTTC directly carries voice calls originating in Japan and terminating in the U.S., including, as an intermediate provider, traffic of mobile roaming-in calls placed in Japan and terminating in the U.S. that originate from U.S. numbers assigned under the North American Numbering Plan (NANP). NTTC uses both IP networks and TDM networks.

2. STIR/SHAKEN Implementation

NTTC has not implemented STIR/SHAKEN protocols. NTTC will be outsourcing services to non-U.S. voice service providers, whereupon NTTC expects to phase out of any direct U.S. voice services.

3. Robocall Mitigation

a. Monitoring

NTT Communications’ Network Operation Centre monitors communications traffic to detect suspiciously high volume or suspiciously patterned traffic and issues alerts as to any such traffic that is identified.

b. Examination

When suspicious traffic is detected, NTT Communications will promptly contact, and question the relevant customers, telecommunication carriers and service providers to ascertain the nature of the traffic and make a determination as to the legitimacy of the traffic.

c. Blocking and Stopping

NTT Communications will take necessary measures based on the guidelines stipulated by the relevant regulatory authorities and in compliance with applicable Japanese Law, to address any unlawful or improper calling behavior that is detected as set forth above.

4. Cooperation with Traceback Requests

NTTC will cooperate with valid traceback requests from the legitimate authorities to the fullest extent technically and reasonably possible, consistent with compliance with applicable requirements of Japanese and other applicable laws.