

SmartTel Inc Robocall Mitigation Plan

SmartTel Inc has complete STIR/SHAKEN implementation for all outgoing phone calls.

The FCC Order lists three affirmative obligations for voice service providers:

- (1) Respond to trace back requests from the Commission, civil and criminal law enforcement, or the Industry Traceback Consortium;
- (2) Take steps to effectively mitigate illegal traffic when it receives notification of such traffic from the Commission through its enforcement bureau;
- (3) Implement effective measures to prevent new and current customers from using its network to originate illegal calls.

1) Trace Back:

SmartTel Inc keeps Call Detail Recording for all incoming and outgoing calls. SmartTel Inc is committed to fully and timely responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and will continue to cooperate with such entities in investigating and stopping illegal robocalls that use SmartTel Inc services to originate calls.

2) Take Steps to Mitigate Illegal Traffic:

- a) SmartTel Inc has complete STIR/SHAKEN implementation for all outgoing phone calls.
- b) We monitor our network for unusual usage. In case we detect or get notified of any suspicious activity and after an investigation, determines whether to issue a warning or terminate service to the customer.

3) Measures to prevent origination of illegal calls:

- a) All customers who utilize our services are verified to have a physical address and letters of authorization signed by verified officers, owners, or managers. The Company also gathers information on the type of business the customers are engaged in as to identify calling patterns.
- b) SmartTel Inc services only to the end user customers and does not sell wholesale services.
- c) SmartTel Inc prevents customers to originate calls from telephone numbers that are not its own.