

Gamma Communications Nederland BV ("Gamma") has implemented a Robocall Mitigation Program, as documented below.

Customer Vetting Process

Gamma implements a rigorous "know your customer" process, designed to adhere to all relevant legal requirements and to prevent new and renewing customers from using our network to originate illegal calls. Gamma strictly offers services to business customers, who are required to submit proof of identity and location.

Any Gamma customer is prohibited from abusive, fraudulent, or illegal use of any of its services. Should a customer use its service for abusive, fraudulent, or illegal purposes, Gamma is allowed it to suspend or terminate service to that customer.

Monitoring Plan

Gamma actively monitors all traffic over its network and will only allow Caller ID numbers to be used when these numbers either belong to the customer sending the traffic, or the customer has provided evidence they are authorized to use these numbers. In addition, Gamma continuously monitors for patterns consistent with robocall campaigns or fraudulent calls. If Gamma detects a pattern consistent with illegal robocalls or otherwise has reason to suspect unlawful activity is taking place over its network, Gamma will identify the party using its network to originate, route, or terminate these calls and take appropriate action. Such action may include, but is not limited to, initiating a traceback investigation, terminating, or suspending the party's ability to originate, route, or terminate calls on its network, and / or notifying law enforcement authorities.

Responding to Traceback Requests

Gamma is committed to responding fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium and to cooperating with such entities in investigating and stopping any illegal robocallers that use its service to originate calls. Gamma's NOC employees have been briefed on the traceback and obligations. Gamma maintains current and correct information about its customers so that it can provide accurate responses to traceback requests.

Point of Contact for Traceback Requests:

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