

ASIA PACIFIC NETWORK ROBOCALL MITIGATION PLAN

INTRODUCTION:

Asia Pacific Network ("APN") operates as sister corporations, ASIA PACIFIC NETWORK CORPORATION ("APNUSA"), a Texas corporation and APN PHILIPPINES, INC ("APNP"), a Texas corporation. APNUSA is a private carrier providing network services to APNP which retails those services in ASIA, primarily in the Philippines. As APN serves a number of call center customers (as well as enterprise customers, including three airlines) it has dealt with the issue of robocalling for some time and has extensive policies and actions (listed in the rest of this document) to reduce this as much as possible.

CUSTOMER BOARDING:

APN believes the best defense against robocalling is KNOW YOUR CUSTOMER ("KYC"). Over 90% of APN's new accounts are acquired via it's direct sales channels (4 sales/support offices in the Philippines). Our sales reps average 5+ years experience with APN and work directly with new accounts to understand the types of campaigns they are running. Most of our high-volume callers utilize our hosting and/or data network services so we can see what types of business they are doing. We reject/reform any new customers that do not intend to conform to US law. APN does not accept wholesale accounts.

New accounts that are not dealt with directly (web sign-ups, etc.) are inspected before service is initiated. Physical addresses are compared to the IP addresses supplied, and, if they do not match, the account is refused.

Beginning in 2023, all new customers that request termination capability to the USA are required to sign our TCPA compliance pledge document. Additionally, the signer is required to be a US citizen and be either a principal in the call center or with the company managing the campaign. We currently reject 3-4 accounts for every one we accept as a result. We have circulated through our base of customers and are requiring older customers to come up to this level of compliance or lose their USA calling privileges. We expect this process to be completed by summer of 2024.

No process is perfect. We respond quickly to any feedback from our upstream carriers/regulatory authorities and, if any policy/ethical violations are found, the account is closed and marked to not allow re-opening. These processes have been quite effective. We have not had a TRACEBACK in over a year which is quite an accomplishment for a Company primarily dealing with call centers.

ONGOING:

APN provides the caller IDs to our customers that are used with over 92% of all outbound calls to the USA that cross our network. We regularly review the inbound traffic to insure that callbacks are being answered.

STIR/SHAKEN:

APN has fully implemented STIR/SHAKEN within it's network and all calls headed for the USA are signed.

Paul Kevin Ford

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