

Procedures to Avoid Originating Illegal Robocall Traffic

- All of our customers are required to contractually commit to the lawful use of our services. We contractually reserve the right to suspend or terminate any customer for which we have a good faith belief that the customer is using the service in violation of the law, including U.S. federal, state or local laws, rules or regulations.
- We perform reactive monitoring and enforcement – When an inquiry is received from a regulatory authority, another carrier, or a customer regarding possible misuse of our services, we investigate the situation and, when appropriate, contact our customer to determine whether they are adhering to the requirement to use our services lawfully. If the customer fails to comply with the law, we can terminate the customer relationship.
- We will respond to all traceback requests from regulators, law enforcement, and other carriers and we will cooperate with such entities in investigating and stopping any illegal robocallers that use our services to originate calls.
- We perform training for all of our employees on our obligations under various laws and regulations regarding the lawful origination and transmission of telephone traffic.