

IP Communications, Inc. Robocall Mitigation Compliance with TRACED Act

IP Communications, Inc. is committed to cooperating with the Federal Communications Commission (FCC), law enforcement, and the industry traceback consortium in **investigating and stopping any illegal robocallers that it learns are using our service to originate calls or transit calls into the United States and territories.**

The Company has fully implemented STIR/SHAKEN.

The Company commits to fully responding within 24 hours to all traceback requests from the ITG, the TPTG, the FCC, and law enforcement. The Company shall cooperate with these groups to investigate and stop any illegal robocallers from using Company's service to carry or process illegal calls. When notified by the FCC's Enforcement Bureau, Company shall block and report identified illegal traffic, and any substantially similar traffic, on an ongoing basis (unless Company's investigation determines that the traffic is not illegal) when Company receives actual written notice of such traffic from the Enforcement Bureau. If Company determines that the identified traffic is not illegal, Company shall provide the Enforcement Bureau with an explanation as to why Company reasonably concluded that the identified traffic is not illegal, and what steps it took to reach that conclusion along with providing calls traffic log information if required.

The Company (IP Communications) utilizes a combination of internal tools; numbers for our customers/subscribers are original in issue and are listed on carrier(s) identified below common blocks only. Telephone Number Authorization, caller identity with originating phone number included within call signaling identifies caller for screening purposes and again uniquely associated with subscriber(s) in common block. A subscriber will be permitted to use the Telephone Number as CallerID for identification and will directly managed by my Company to track customer(s)/subscriber(s) number(s) within that inventory database system. If one of our customer(s)/subscriber(s) tries to use a Telephone Number as CallerID not directly managed by my Company (or Third Party Common blocks as assigned: directed by PayG LLC dba SkySwitch, Coredial LLC, Reinvent LLC) call validation will not continue, call traffic will end. If Telephone Number validation is necessary, our customer(s)/subscriber(s) will need to provide a valid letter of authorization that they are the authorized user/owner of such Telephone Number for origination to continue. If the Telephone Number(s) can adequately be validated, than telephone number will be added to the inventory database system and will follow above permission structure for call process.

Company third-party solution providers; directed by PayG LLC dba SkySwitch, Coredial LLC, Reinvent LLC check for Do Not Originate (DNO) numbers (verification for identified numbers within their assigned common blocks) not listed. In addition, the Company utilizes a combination of internal tools to detect invalid phone number formats, area codes and unassigned number blocks. The Company also utilizes data analytics to detect and investigate irregular and unexpected calling patterns, originating number use against customer(s)/subscriber(s) profiles.

The Company uses data systems for analytics and reviews to identify illegal robocalling in addition to a Know Your Customer (KYC) requirement to access the Company's networks.

The process includes:

- Monitoring the network to identify suspicious traffic patterns.
- Limiting customers' capacity via call per second and/or concurrent session limits.

- Regularly checking call patterns for possible abusive traffic.
- All new customers are verified with a combination of electronic and manual verification systems, credit reviews, references from trusted industry members, and previous experiences with customer executives and employees. The Company severely limits the capabilities of new accounts until these appropriate processes are complete.

IP Communications, Inc. has three upstream providers from which it receives voice traffic:

1. PayG LLC dba SkySwitch
Arborcrest 1, 751 Arbor Way
Suite 150
Blue Bell, PA 19422
Phone: 747.777.8100
Email: support@skyswitch.com
2. CoreDial LLC
Arborcrest 1, 751 Arbor Way
Suite 150
Blue Bell, PA 19422
Phone: 215.297.4400
Email: cdsupport@skyswitch.com
3. Reinvent Telecom
10190 E. McKellips Road
Scottsdale, AZ 85256
Phone: 855.455.7346
Email:
partnersupport@reinventtelecom.com

The Company reserves the right to refuse traffic from any party at any time where robocalling or use of originating numbers that are not valid or they are not authorized to use has occurred or is suspected. The Company is able to block the originating number(s), terminating numbers(s), trunk(s) or customer, including termination of customer relationship to prevent robocalling, invalid originating number or spoofed origination number transiting the Company's networks.