

US South Communications Robocall Mitigation

Robocall Mitigation Compliance with TRACED Act

Date	On behalf of	Change Summary
June 18, 2026	US South Communications, Inc. / InComm	V5 expanded KYC framework, vetting, clarified traceback consortium participation, added 10-business-day update and annual recertification commitments, expanded real-time monitoring detail, removed third-party names when not applicable or provided by multiple providers

US South is committed to cooperating with the Federal Communications Commission (FCC), law enforcement, industry members and the industry traceback consortium in investigating and stopping any illegal robocall activities that US South learns are using the US South network to originate calls or transit calls into the United States and territories.

US South has OCN 019K and FRN number 0003747490 for further identification. As of this update, US South has not been subject to an FCC, law enforcement or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.

We perform the following roles in the call chain:

- A voice service provider with a STIR/SHAKEN implementation obligation acting as a wholesale provider originating calls and serving end-users.
- Gateway Provider with a STIR/SHAKEN obligation.
- Non-Gateway Intermediate Provider with a STIR/Shaken obligation.

We use various next hop carriers in our least cost routing.

US South offers wholesale and retail services including domestic and international call termination, origination, toll-free and phone numbers via third parties. US South is wholly owned by HI Technology Corp. f/k/a InComm Holdings and commonly known as inComm Payments (www.incomm.com).

The table below reflects the ownership of US South at the time of this filing:

Entity	Status	Key Principle(s)	Control of Entity
US South Communications, LLC	Subsidiary	HI Technology Corp.	100%
HI Technology Corp.	Owner	M. Brooks Smith	Greater than 50.1%

All calls originated on the US South network are subject to the US South Robocall Mitigation Program which is implemented to meet or exceed FCC's requirements. US South has not had a prior certification or plan removed by FCC action nor has US South been prohibited from filing in the FCC Robocall Mitigation Database (RMD).

US South hereby submits this Robocall Mitigation Plan to the Federal Communications Commission ("FCC").

1) Traceback: US South will respond fully and within 24 hours to all traceback requests from the Federal Communications Commission (FCC), civil law enforcement, criminal law enforcement, and the industry traceback consortium(s). We also work with individual carriers to facilitate traceback and bad

actor identification. Traceback requests may be submitted to NSBO@incomm.com. US South also requires our customer cooperation in traceback requests. US South participates in the SOMOS Traffic Pumping Traceback Group (TPTG) for the investigation and traceback of suspected illegal toll-free traffic pumping. US South additionally subscribes to Do Not Originate (DNO) services through the USTelecom Industry Traceback Group (ITG).

2) STIR/SHAKEN status: US South has fully implemented STIR/SHAKEN for calls originated on our network and as a Gateway Provider only where the foreign carrier or upstream carrier has complied with FCC requirements including being present in the RMD as required.

3) We have registered with the STI-PA using OCN 019K. We have our own STIR/SHAKEN certificate issued by an FCC-approved STI Certificate Authority (STI-CA) that we use when authenticating calls we originate.

4) Do Not Originate use: US South has assembled multiple Do Not Originate (DNO) numbers based upon ten (10) digit numbers and continues to review and expand the DNO resources to include in the screened calls that result in rejection or call failure due to inclusion in the data set. In addition, US South screens for invalid phone number formats, area codes and unassigned number blocks. We also utilize data analytics to detect and investigate irregular and unexpected calling patterns, originating number use against customer profiles.

5) Robocall Identification, Know Your Customer, and Upstream Provider Vetting: US South uses internal data systems for analytics and reviews to identify illegal robocalling.

Know Your Customer (KYC). Consistent with 47 CFR § 64.1200(n)(5), US South takes affirmative, effective measures to know its customers and to prevent the origination of illegal traffic on its network. Before onboarding any new customer, and on an ongoing basis thereafter, US South verifies and documents the following:

- The customer's status as a properly registered, US-domiciled entity (or, if foreign, the customer's lawful basis for sending traffic to the US network);
- The customer's FCC Registration Number (FRN) and, where applicable, Operating Company Number (OCN);
- The customer's Form 499 Filer ID and contributor status, where applicable;
- The customer's presence and current standing in the FCC Robocall Mitigation Database (RMD);
- The customer's STIR/SHAKEN implementation status and call-authentication capabilities;
- Ownership and beneficial-ownership information, including key principals and percentage of control;
- Active business presence, including operating website, business email on a company domain, and primary place of business;
- Trade and banking references sufficient to corroborate operating history;
- Expected traffic profile, including originating-number ranges, call destinations, call types, and anticipated volumes.

Customer files are reviewed on an ongoing basis. Material changes in a customer's status — such as loss of RMD listing, regulatory or law-enforcement action, or a material deviation from the customer's documented traffic profile — trigger re-vetting and may result in capacity restrictions, suspension, or termination of the customer relationship.

Upstream Provider Vetting. US South maintains a structured intake form and documented review process for upstream providers from which it accepts traffic. The intake captures the upstream provider's regulatory status, RMD listing, STIR/SHAKEN implementation, ownership and contact information, and expected traffic characteristics. Upstream providers that do not appear in the RMD are not accepted as direct sources of traffic, consistent with 47 CFR § 64.6305(g). Upstream files are reviewed on an ongoing basis and re-vetted when material changes are identified.

US South process includes:

- i. Monitoring the network to identify suspicious traffic patterns including, but not limited to:
 - Investigate high volume, low answer or low duration calling patterns
 - Traffic patterns that are not as expected based upon customer qualification and reviews
 - Depending on customer risk profile and pattern detection, US South evaluates calling patterns at call set-up, in-flight, in real time and near real time, and via post-call analysis. Higher-risk customers, and traffic that deviates from a customer's documented profile, receive elevated monitoring intensity
 - Mitigation may include customer turn-off or manual call verification before forwarding to other networks
 - Real time key performance indicator (KPI) of individual origination numbers can be used to screen calls
- ii. Limiting customers' capacity via call per second and/or concurrent session limits, reviewing and updating on a regular basis
- iii. Regularly checking all call patterns for possible abusive traffic
- iv. Filtering and scanning for number anomalies in traffic flows from upstream customers.
- v. All new customers are verified with credit review, references from trusted industry members, and previous experiences with customer executives and employees, in addition to the Know Your Customer verification described above.

6) US South reserves the right in contracts and in practice 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. US South will initiate a traceback request to our customer, but also 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 US South network.

7) Material Change Updates and Annual Recertification: US South will update its filing in the FCC Robocall Mitigation Database within 10 business days of any material change to the information provided, consistent with 47 CFR § 64.6305(d)(5), (e)(5), and (f)(5). US South will recertify its RMD filing annually on or before March 1, consistent with 47 CFR § 64.6305(h), and will pay any applicable filing fees in connection with such recertification.