

ComStar Technologies, LLC

and

Comtel VoIP, Inc.

Robocall Mitigation Plan

Updated: September 2025

Introduction

This document details the steps taken by the affiliated entities, ComStar Technologies, LLC and Comtel VoIP, Inc. (collectively, "Company") to avoid originating illegal robocalling.

The Company provides resold interconnected VoIP services and does not own or control facilities that would enable it to implement the STIR/SHAKEN authentication framework. Accordingly, the Company is exempt from a STIR/SHAKEN implementation obligation. *See First Caller ID Authentication Report and Order*, 35 FCC Rcd at 3241, para. 40; 47 CFR Section 64.6304(b).

Know Your Customer

The Company serves only business customers and verifies their identity through multiple sales meetings with customer contact(s) to gather business information on the customer's operation including in-person site visits. Proof of Tax ID is required. Credit checks are conducted using a 3rd party credit check organization.

The Company will not activate clients that provide anonymous information or where data mismatches are found. Additionally, prospective customers must agree to the Company's strict policies and contractual terms prohibiting illegal and/or fraudulent calling as a condition of doing business. The terms and conditions state that a customer's service will be terminated if they are found to engage in such calling.

Traceback Requests

The Company is committed and will respond fully within 24 hours to all traceback requests from the FCC, law enforcement agencies, and the Industry Traceback Consortium and will cooperate with these agencies to investigate and stop any illegal robocallers that use its service to originate calls. The Company devotes sufficient resources to provide prompt and complete information to traceback requests. The Company's point of contact to handle all traceback requests is:

Shiro Ando, Managing Director, Solutions & Technology, MSG US
Email: shiro.ando@neweratech.com

If a traceback exposes an existing customer as the source of illegal robocalls, the Company will contact the customer for an explanation and verification that the traffic will be discontinued. If the Customer files to discontinue the calling immediately, the Company will discontinue service to the offending customer.

Telephone Numbers

The Company confirms a customer's right to use a telephone number by requiring documentation from the customer of its prior ownership of the number before porting the number to our service.

International Calling

The Company does not sell services to international call originators using North American Numbering Plan Numbers.

Call Analytics

As a reseller, the Company relies on its underlying providers and/or their third-party vendors to determine if originating calls should be blocked based on call analytics. The Company has not contracted directly with any third-party vendors for call analytics.