



Call Tools, Inc.

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Robocall Mitigation Plan

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1. Certification

CallTools certifies that all calls originating on our network are subject to a robocall mitigation program meeting all requirements. We confirm that any prior certification has not been removed by Commission action, and we have not been prohibited from filing in the Robocall Mitigation Database. Additionally, we disclose our implementation status of STIR/SHAKEN on the IP portions of our networks as Fully Implemented.

2. Traceback Response

In an effort to combat robocall activity, CallTools responds to all traceback requests within a 24 hour period. Additionally, we respond to all law enforcement, and any other agency involved with combating illegal robocalling.

3. Acceptable Use Policy (AUP) and Terms of Service

CallTools requires the responsible use of our networks, systems, services, websites and products (collectively, "Call Tools Services") by our Customers, Customers' end-users and customers, and other users of Call Tools Services (collectively, "Users"), and to enable us to provide Users with secure, reliable and productive services. Our AUP dictates that the use of our system is compliant with all relevant law, including but not limited to the Telephone Consumer Protection Act.

4. We Know Our Customers

In addition to meticulously reviewing and confirming business information, our dedicated team is extensively trained to inquire deeply into the nature of our customers' businesses. We engage in thorough discussions, asking probing questions to gain a comprehensive understanding of their operations. We seek specific use cases to ensure that we grasp the precise purpose and intent behind their calls. This rigorous approach allows us to tailor our services effectively to meet the unique needs of each client.

5. Monitoring

Call Tools monitors metrics and ratios of failure types, quantity, calls per-second, and for behavior consistent with illegal robocalling. In the event that these metrics indicate a potential violation of the Telephone Consumer Protection Act (TCPA) or suggest robocalling activity, we take swift and decisive

action. Our team is equipped to investigate any anomalies thoroughly and implement necessary measures to ensure compliance with regulatory standards and industry best practices.