

Unified Office, Inc.

Robocall Mitigation Plan

Unified Office, Inc.

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Introduction

This document details the reasonable steps and actions taken by Unified Office, Inc. ("Unified Office") to mitigate and eliminate illegal robocalling. Unified Office has an ongoing commitment to scan for and help alleviate illegal robocalling by pre-qualifying prospective customers, monitoring existing customers for traffic patterns indicative of prohibited robocalls, and working with other providers and regulatory agencies in combating fraudulent voice activity. Unified Office provides wholesale Voice-over-Internet Protocol ("VoIP") calling service. All telecom services are provided on a resale-only basis. As a telecom reseller, Unified Office is dependent on our underlying providers' assistance with monitoring their networks for fraudulent voice calling patterns.

Knowledge of Underlying Provider

Unified Office works with multiple upstream carriers and has received written assurances that all carriers providing services to Unified Office will uphold strict FCC STIR/SHAKEN and robocall mitigation requirements. Unified Office also controls and upholds all STIR/SHAKEN rules for its services. Unified Office and its upstream providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Knowledge of Customers

Due diligence is performed to understand potential customer business models and the potential, or lack thereof, for involvement in fraudulent robocalling schemes. Unified Office performs a site survey with a face-to-face visit at the prospective customer's physical location. We also perform a credit review which includes checking references of important business relationships. In our research of the prospect, Unified Office will not activate clients that provide anonymous information or where data mismatches are found. Additionally, prospects are required to agree to Unified Office's strict policies and contractual terms as defined in our Master Services Agreement prohibiting the act of fraudulent voice activity as a condition of doing business with Unified Office. Our prospective customer shall be responsible for, and agrees to comply with, all laws, statutes, ordinances and/or regulations applicable to prospective customer's business and its use of Unified Office services. Individuals associated with prospects or current customers who have been known to act improperly or otherwise be involved in fraudulent robocalling will cause their companies to be rejected by Unified Office as a customer and any existing customer relationships could potentially be severed. Unified Office prevents any customer from using unassigned phone numbers with our services.

Traceback Requests

Unified Office 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 vows to cooperate with these agencies in investigating and stopping any illegal robocallers that use our service to make calls. Unified Office will devote sufficient resources to provide prompt and complete information to traceback requests. Our point of contact to handle all traceback requests is:

Unified Office Customer Support

Manager of Customer Support

Upon calling our dedicated Customer Support Department, an initial ticket is opened with Tier 1, Tier 2, and/or Tier 3 Network Operations. This request is then routed to the switch operator and management is notified. We will then identify if calls apply to originating DID rules and extract the logs in question. If a traceback exposes an existing customer as the source of fraudulent robocalls, or as having transmitted fraudulent robocalls, a demand for an explanation and verification of mitigation of the traffic is issued to the customer. If the fraudulent traffic is not remediated, Unified Office immediately begins rejecting all traffic from the offending customer.

Telephone Numbers

A Telephone Number ("TN") based caller identity is the originating phone number included in call signaling used to identify the caller for screening purposes that is unique. A subscriber is permitted to use a TN as a caller identity if a TN is directly managed by Unified Office and/or obtained by Unified Office from Unified Office's underlying carrier for use by the subscriber. Numbers can also be allocated by Unified Office or ported using information from previous bill matching customer information. For subscribers with multi-line telephone systems, Unified Office and our underlying provider allow calls to be connected. This screening capability enables an automated and secure method of validating originating telephone numbers.

International Calling

Unified Office is not currently an international voice services provider. If at any time Unified Office does decide to sell our services to international customers using North American Numbering Plan resources, we will familiarize ourselves with and develop best practices for full vetting of such customers and work with our underlying provider to perform the necessary telephone number validation on all international originated calls.

Call Analytics

As a reseller, Unified Office must rely on our underlying provider and/or their third-party vendors to determine if originating calls should be blocked based on call analytics practices. In our efforts, Unified Office does monitor for calls to be sourced only from known locations and known DID's/TN's. We produce a monthly Traffic Study which summarizes call activity by customer location. We review this information and look for outliers and anomalies.

Ongoing Robocall Mitigation

Unified Office monitors and examines call detail records (CDRs) on a repeating basis to detect suspicious call activity and/or calling patterns. When we and/or our underlying provider detect network usage patterns consistent with illegal robocalls or suspect illegal robocalling is taking place, we will immediately seek to identify the party that is originating, terminating, or routing these calls so that we may take appropriate action. The actions taken may include, but are not limited to initiating a traceback investigation; verifying that the originating customer owns or is authorized to use the Caller ID number; determining whether the Caller ID name sent to a receiving party matches the customer's corporate and/or d/b/a name; block the party's ability to originate, terminate, or route calls on the network; and/or providing notice to law enforcement authorities. As part of our Plan to mitigate and prevent any originating robocalls, we are committed to early identification and investigation of possible robocalling conditions. Among other things, we watch for higher than normal subscriber traffic volume,

including large bursts of traffic in small timeframes or spikes in usage. We also monitor for originating calls of short duration and low call completion percentages.

Unified Office Contact for Robocall Mitigation-Related Issues

Please direct any questions related to Robocall Mitigation issues to:

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