

Juxto, LLC (d/b/a Teams Plus)

Also, Telogiks, LP

Network-Value Parts, LLC

Robocall Mitigation Plan

Updated: April 2024

Introduction

Juxto, LLC. (“Juxto” or “Company”) and its affiliated entities are fully STIR/SHAKEN compliant and has implemented the Robocall Mitigation Plan described herein in accordance with the requirements of the recent FCC rules and orders. The Company views these policies and procedures as constituting “reasonable steps” to avoid the origination of illegal robocalls on its network and in addition to following these steps the Company commit to responding to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG), and to cooperate with such entities in investigating and stopping any illegal robocallers that may use its service to originate calls. The Company states that neither it or any affiliated entity has been subject to a Commission or other law enforcement agency action or investigation in the prior two years due to suspected involvement with illegal robocalling or spoofing, or due to a deficiency in its RMD certification.

Juxto is an STI-GA authorized Service Provider registered with the Secure Telephone Identify Policy Administrator (STI-PA) and participates in the Signature-based Handling of Asserted Information Using toKENs (SHAKEN) ecosystem. The Company authenticates its customers following the Robocall Mitigation strategies described herein and based on that authentication, attaches the appropriate attestation level to its customers’ outgoing calls.

Robocall Mitigation: Measures to prevent origination of illegal robocalls

Know Your Customer

Juxto has several processes in place to vet its customers, including the following:

Juxto provides services exclusively to non-residential subscribers. Customers are required to provide Company name, address, website URL, contact information, President/CEO contact information, Tax ID and/or D&B number, year company was established, and customer officer signature on the customer service agreement. The Company further vets customers by researching their company website and online reviews. Juxto also performs credit checks when applicable.

Juxto requires customers to provide it with estimates of their usage and denies service to companies that have a history of short-duration calls or that use dialers. The Company provides usage bundles that are sized in accordance with the Customer’s estimated usage volumes.

Telephone Number Validation

The Company requires all end users who request to port numbers to the Company's service to provide a signed Letter of Authorization ("LOA"). Juxto also requests invoice copies of services provided by their current service provider and Customer Service Records to confirm the customer's right to use the telephone numbers.

The Company's customers are not authorized to change the published caller ID number on outbound calls.

International Calling

Juxto allows its customers to utilize NANPA numbers from international locations in limited circumstances and subject to additional terms and conditions that strictly prohibit activities that may be complicit in illegal robocalling schemes, including: 1. Continuous or extensive chat line or conference call participation 2. Use of free conference calling or similar services that Company in its sole discretion deems to participate in traffic stimulation practices or schemes that result in excessive charges 3. Use of an open telephone line as a monitoring, intercom or similar service 4. Repetitive and/or continuous messaging or calling to the same destination or number if such activity could reasonably be expected to or in fact does provoke complaints 5. Long duration calls (defined as calls to the same number more than four continuous or cumulative hours within a 24-hour period) and/or calls placed to specific numbers/destinations for the purpose of generating charges or fees for or with a third party 6. Use of call Services which do not consist of uninterrupted live human voice dialog by and between natural human beings 7. Restricting or inhibiting any other User or any other person from using and enjoying the Services and/or the Internet 8. Engaging in any of the foregoing activities by using the services of another provider or third party and channeling such activities through an account provided by Company, or otherwise involving the Services or any Company account in any way with or without another provider or third party for the purpose of facilitating the foregoing activities 9. Utilizing robocalling, autodialing, predictive-dialing or other software or technologies for illegal means.

Scenarios in which NANPA numbers may be used by customers from an international location include: 1) A remote working using VPN or Static IP 2) A worker that is traveling abroad on vacation or work trip that may use a client to work remotely. 3) Call Center Overflow. These customers are fully vetted and provisioned over VPN or static IP

Traceback Requests

Juxto is committed to 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. The Company has signed a contract amendment with Verizon allowing traceback and is requesting membership in the ITG.

The Company has devoted sufficient resources to provide prompt and complete information to traceback requests. The Company's points of contact to handle traceback requests are:

Name	Title	Contact Information
Chris Andersen	Senior Voice Engineer	candersen@teamsplus.com 833-589-8682
Ricardo Ordonez	CFO	ro@teamsplus.com 833-589-8682

The Company investigates traceback requests by analyzing its call detail records and switch call history. Juxto can also determine the IP address from which the calls are originating and can verify that the Caller ID information is correct. The Company can also analyze a customer's calling trends over time to detect unusual call patterns. If suspicious calling activity is found, the Company will notify the customer and the customer's service will be suspended or terminated for violation of the Company's terms and conditions.

Other Robocall Mitigation Practices

In addition to the measures described above, Juxto has enforceable terms and conditions and an Acceptable Use Policy within its contracts that define unacceptable and/or fraudulent use of its services and allow the Company to suspend and/or terminate service if a customer violates the terms of the agreement.

Juxto routinely monitors its outbound traffic for unusual or suspicious call patterns. It relies on third-party vendors, Bandwidth and Sinch, to authenticate inbound calls. The Company also relies on its third-party vendors to block any inbound calling coming from companies that are not registered in the Robocall Mitigation Database.