

Robocall Mitigation Program

Blended Technology has taken specific reasonable steps to avoid, the origination, carrying, or processing of illegal robocall traffic. Blended Technology reserves the right to modify and/or supplement this Robocall Mitigation Plan to adapt to risks and to improve the overall effectiveness of our program.

Call Analytics

Blended Technology employs call analytics as a measure of identifying suspicious call traffic. Bandwidth, Inc's plan states they "have developed call blocking tools that prevent calls with specific unlawful ANI/'FROM' TN characteristics from traversing the Bandwidth network. Bandwidth personnel regularly analyze network traffic looking for unlawful robocall campaigns and utilizes our call blocking tools when appropriate. We work diligently with our customers to stop all detected unlawful robocall campaigns and proactively communicate with those customers that may be in the path of unlawful robocalls." Blended Technology also relies, in part, on call analytics used by Bandwidth, Inc.

Acceptable Use Policy

If Blended Technology receives an alert from Bandwidth Inc., the Company will take action consistent with its Terms of Service (TOS) and commensurate with the severity of the customer's offense. The TOS expressly prohibits utilizing Blended Technology's network for deceptive purposes, engaging in fraudulent or unlawful activities, and violating local, state, or federal laws. See <https://blendedtechnol.wpengine.com/wp-content/uploads/2022/09/Blended-Technology-Terms-of-Service.pdf>

Consistent with its TOS, the Company may provide customers who violate its policy with a warning, terminate the customer's service, and /or report the misconduct to the appropriate authorities.

Know-Your-Customer Processes

Blended Technology vets the identity of its customers when approving an order for service, provisioning network connectivity, or entering into contractual agreements. Blended Technology collects from retail customers their name and address, physical location, contact information, and, for business customers, their jurisdiction of incorporation, federal tax ID, and nature of business. Blended Technology may utilize third-party agencies to gauge credit and /or fraud risk associated with a potential customer. Additionally, Blended Technology will confirm the identity of new or renewing business customers by collecting information, including a contact person for the business, the physical location of the business, the state and /or country of incorporation, and the federal tax ID.

Know-Your-Upstream Providers

In its Robocall Mitigation Plan, Bandwidth, Inc. states that it utilizes several systems and proprietary processes to detect and block unlawful robocalls that have the following types of ANIs, defined by the FCC as unlawful:

- **UNALLOCATED:** A valid NPA NXX XXXX in the North American Numbering Plan (NANP), but NOT assigned to a carrier, nor in the LERG. Any call that contains a phone number in the ANI / From field that has not yet been released for public consumption from the NANP.
- **INVALID NUMBER:** A complete telephone number (TN) that is NOT VALID, but of the correct format [2-9][0-9][0-9] [2-9][0-9][0-9] [0-9][0-9][0-9][0-9] (i.e., 10 digits in length, 1st and 4th are [2-9] all others are [0-9]. Any call that contains a character string of digits or letters that doesn't fully comply with E.164 formatting and the Local Exchange Routing Guide (LERG). This includes ANI / From fields with all digits of the same number, or anything less than 10 valid digits assigned from the NANP.
- **INVALID DIGITS:** The calling party number is numeric but doesn't fit into a category defined above (i.e., all 1's, all 0's, partial entries <10 digits etc.).
- **INVALID ALPHA-NUMERICS:** Invalid alphanumeric strings used to misdirect, impersonate, disguise, or deceive SIP signaling.

Traceback

Blended Technology will respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and cooperate with such entities in investigating and stopping any robocallers that use our network to originate robocalls.