

Steps Taken to Avoid Originating Illegal Robocall Traffic

- We will respond immediately to all traceback requests we received from regulators and others upfront carriers and of course we will terminate and stop any illegal robocallers that use our services to originate calls as we always did up to now.
- All our customers are required to contractually commit to the lawful use of our services before they create an account with us. They complete a form with all the rules and best practices to follow and they must need to sign the document, this complete documentation it's located in our webpage and every client need to read it and accept the contract to work with us. We contractually reserve the right to suspend or terminate any customer for which we have a good faith belief that the customer is using the service in violation of the law, including U.S. federal, state or local laws, rules, or regulations.
- We perform reactive a monitoring traceback procedure. When we received a complaint from our upfront providers or any regulatory authority, we trace the customer Caller ID and IP Address and based of the information we do the following: 1) We terminated the customer account. 2) We block his IP Address in our firewall, and we look for his IP Address owner and we report it to the hosting where the traffic it's being originated if the IP was a public one. 3) We inform our providers about the steps we applied and gather all the information regarding the situation.
- We perform training for all our employees to teach how to detect patterns that are commons in robocalls like call duration, caller ID Spoofing, ASR, etc.