

TRITON NETWORKS, LLC

ROBOCALL MITIGATION PLAN

ABOUT TRITON NETWORKS, LLC

Triton Networks, LLC is a Limited Liability Company formed under the laws of Texas and is a registered carrier with the FCC. The Company holds the FRN/CORES ID Number: 0020530002 and holds 499 Filer ID Number: 828684

The Company has been in business for over 14 years providing unique telecommunications products and services to business customers on a nationwide basis.

The company designs powerful, flexible, secure, and highly scalable voice, data, Internet and integrated communication services for businesses nationwide. Additionally, the company is able to bundle products and services of multiple Trusted Carriers increasing their ability to solve business problems.

Triton Networks, LLC helps businesses and organizations nationwide leverage critical changes in telecommunication technology to increase productivity, reduce operating costs, and protect the bottom line. Triton Networks offers, scalable and innovative solutions when it comes to Voice, Data, Networking and Cloud Solutions designed specifically for a customer's industry and customized for their business.

The Company resells the products and services of Tier 1 and Tier 2 Carriers, using a predominantly the underlying service providers network since the Company has no facilities or switches to transport traffic.

The Company primary place of business is:

12655 N. Central Expressway, suite 500

Dallas, Texas 75243

214 570-0555

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www.tritonnet.com

Leaders of the company are:

CEO:

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MEASURES TO PREVENT ORIGINATION OF ILLEGAL CALLS:

Know Your Customer:

The Company has a rigorous KYC policy for the in order to support the Business Customers that it sells and resells services to. The Company has an in-depth presales process where representatives of the Company work with the prospect or customer to understand all the unique factors of the Customer's business. This objective of this is twofold: a. to get to know the customer; and b. to provide the best possible service to the customer by fully understanding all facets of their business.

The Company performs a thorough credit check on each of its customers and verifies the following information: legal business name, legal form of business, federal tax ID, nature of the business, primary contact person, and service address.

Not only does the Company have a rigorous intake and Onboarding process where it secures extensive information for Customers but all relationships between the Company and customers are governed by an MSA which specifically states the business Customer is not able to resell any services which the Company resells and the services which are sold to the Customer are strictly for the Customers own internal use. The company has an Acceptable use Polley included in its Master Service Agreement describes the steps the company will take to mitigate illegal traffic. the relevant portion reads as follows:

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Acceptable Use Policy ("AUP"). Customer agrees not to allow the use of the Service in any way to transmit or post material that as Triton determines in its sole reasonable discretion: (a) is prohibited by any law or regulation, or facilitates or encourages the violation of any law or regulation; (b) disrupts third parties, or violates the intellectual property rights or other rights of Triton or any third party; (c) is abusive, profane, libelous, slanderous, obscene, threatening, misleading, harassing, discriminatory, or otherwise harmful or disruptive; (d) violates or tampers with the security of any computer equipment, network, or program, (e) constitutes, facilitates, or encourages unsolicited commercial email or "spam". If Customer Violates the AUP, Triton reserves the right to immediately suspend or disconnect Service and charge all applicable termination fees.

The Company performs a thorough credit check on each of its customers and verifies the following information: legal business name, legal form of business, federal tax ID, nature of the business, primary contact person, and service address.

STIR/SHAKEN Implementation

Company has no defined implementation related to STIR/SHAKEN and the parameters of call authentication framework. And as a reseller with no switch the Company is not able to implement SIR/SHAKEN in any manner. Since the Company lacks control over the facilities and network infrastructure necessary to implement STIR/SHAKEN the Company relies on authentication Caller ID authentication standards adopted by Intermedia and Touchtone Communications. Triton Networks does not possess the ability to manually enter phone numbers of company or customer choosing in the outbound Caller ID field (the number that is presented to the called party along with the phone call) associated with the account. Only phone numbers that are assigned to the applicable account are allowed to be selected as outbound Caller ID numbers for that account. Phone numbers that are in the porting process will also be restricted from being added until the port completes.

Customers must provide proof of ownership of the number that customer wishes to use, such as a current copy of their bill for that other phone number. Once their ownership of that number has been documented, Triton carrier support team will be able to set up such a Caller ID for the customer.

Therefore, the Company is excluded from the FCC's STIR/SHAKEN implementation obligation pursuant to paragraph 40 of the FCC's First Call Authentication Report and Order. Alternatively, the Company relies on its underlying carrier partner(s), which own and maintain the network infrastructure, to implement and utilize STIR/SHAKEN authentication.

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In relationship to the initial, and subsequent FCC Orders concerning STIR/SHAKEN and the Robocall Mitigation Database (RMD), the Company is without STIR/SHAKEN obligation.

NETWORK MONITORING AND CALL BLOCKING

The Company will rely on its underlying carrier partners to give notice if robocalls are detected.

The Company will work with its underlying service providers to block calls originating from its customers if necessary due to fraudulent activity. The Company will issue a request to the underlying carrier to block illegal calls.

TRACEBACK AND INQUIRY & RESPONSE

The Company commits to respond to all inquiries made by the FCC, law enforcement, the ITG and/or any other like or similar governing body within 24 hours of initial. The Company is committed to combating robocalling and other nefarious acts and violators of the TCPA therefore the Company shall always fully cooperate with these groups to investigate and stop any illegal activity and persons who try to commit such bad acts from using Company's service to carry or process illegal calls.

When notified by any agency, the ITG, any regulatory governing concern and/or the FCC's Enforcement Bureau, Company immediately directs its underlying provider to block and report identified illegal traffic, and any substantially similar traffic, on an ongoing basis (unless Company's investigation determines that the traffic is not illegal).

If and when the Company determines that the identified traffic is not illegal, Company shall provide the Enforcement Bureau with an explanation as to why Company reasonably concluded that the identified traffic is not illegal, and what steps it took to reach that conclusion.

UPSTREAM PROVIDERS AND CALL ASSIGNMENT

Through its two upstream providers the company resells and leverages the network of other carriers. The Company has no switch and does not provision its own traffic.

The Company utilizes the full facilities of these two carriers and does not have their own switch. The Company is not a gateway Provider, and it does not deal with any Foreign Service Providers.

The carriers upon which the Company does not carry its own traffic or calling volume on its

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own infrastructure and relies for complete networks services are:

1. Intermedia Cloud Communications
2. Touchtone Communications

The Company reserves the right to refuse traffic from any party at any time where robocalling or use of originating numbers that are not valid or they are not authorized to use has occurred or is suspected.

The Company notifies its underlying carriers to block the originating number(s), terminating numbers(s), trunk(s) or customer, including termination of customer relationship to prevent robocalling, invalid originating number or spoofed origination number transiting the Company's networks.

ADDITIONAL INFORMATION

Although it should be clearly understood by reading this document that the Company has no facilities, no switch, or any other way to originate traffic, the Company has secured an IPES OCN Code from NECA and also the proper token/certificate in order to be in full compliance.

Either now and/or in the future the Company will not use these items in the context of its business as there is no real necessary function of use since the Company does not provision its own traffic, nor does it access or modify a SIP header of a call in any manner.

However, the Company has always strived to be in full compliance of any FCC Order and therefore has secured these two items.

COMPANY DECLARATION

The Company certifies that it has never been under investigation or committed any violations within the last two years with any local, state, or Federal agency or equivalent related to telemarketing or robocalling. Additionally, the Company is not currently subject to a formal action or investigation due to suspected unlawful robocalling or spoofing.

If when and as the Company business may change designated Company representatives only will update this RMP as appropriate.