

San José, Costa Rica, May 12, 2022
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Mesers
FCC
Robocall Certification Program
Present

Robocal Mitigation Plan

Dear sirs:

By this means CallMyWay NY S.A. a Costa Rica licensed, interconnected telephony operator certifies the following mitigation plan to avoid originating illegal robocall traffic as part of its robocall mitigation program, and, if applicable, the type of extension or extensions it received under 47 CFR § 64.6304, as follows:

I. Overview

The FCC requires that all providers certify in the FCC Robocall Mitigation Database their status for compliance with STIR/SHAKEN. Those not yet fully compliant must implement and certify to the implementation of a Robocall Mitigation Plan to ensure that this illegal traffic does not originate on their networks as they work within the industry to become fully compliant.

The Commission requires voice service providers to develop a Robocall Mitigation Plan that:

- details the reasonable steps taken to avoid originating illegal robocalls
- demonstrates a commitment to respond to traceback requests to cooperate with investigating and stopping illegal robocalls
- is filed in the Robocall Mitigation Database.

This mitigation plan is submitted on behalf of CallMyWay NY S.A. (CallMyWay), which provides services abroad.

CallMyWay has worked with our selected providers/gateways over many years and they are trusted providers as an Authorized Service Provider in the FCC database.

II. General Prohibition Against Illegal Robocalling

CallMyWay end user services are subject to restrictions contained in its published legal notices and all executed services orders include the requirement that service is provided pursuant to its terms of service ("TOS") requirements.

Our existing TOS prohibit activities normally associated with Robocalling including, but not limited to:

- The Existing TOS prohibit activities normally associated with Robocalling including, but not limited to: providing altered, deceptive; or false information about the identity of the sender or the origin of a message or phone call;
- Violating any applicable local, state, or federal law; using the CallMyWay service to engage in or in connection with fraudulent activities

In addition, the company is updating its TOS to expressly reference the prohibition on robocalling, and all current subscribers will receive notice of the publication of its updated TOS.

CallMyWay end users are notified that CallMyWay may take action up to suspension or termination of service for violation of the TOS.

III. Knowing Our Customer

CallMyWay utilizes the mitigation technique of "Knowing Our Customer." CallMyWay is a small, long-established provider that maintains a close relationship with its customers. Our customers are generally small businesses, and few have enough call paths to generate the high volume of traffic associated with robocalling allowing us to use targeted in-house analytics to monitor, alert and apprehend suspected robocalling activities.

CallMyWay has set a call path level based on its average customer size. The level — referred to as "large volume calling capability" — is subject to change.

CallMyWay screens for new customers requesting service at or above large volume calling capability levels:

- We will not deploy large volume calling capability as a residential service
- All businesses must provide a tax ID and verification as to the nature of the business
- We verify for valid ID, Tax ID and addresses
- A CallMyWay representative may visit the premise of the customer to verify the number of users at the location is appropriate for the volume of calling
- CallMyWay ensures that the caller-ids for each DID/line are set during customer configuration.
- CallMyWay selects the DID for any new customers, or if the customer is porting DIDs to us, those DIDs will be the only ones configured in our system.
- Customers do not have any write access to the PBX to change call ID other than customer assigned Call-IDs.
- Any changes to service must come through our call center and a ticket created so we have an audit log of any changes made for the customer.

CallMyWay serves long-time business end users with the potential for large volume calling capability. They are being directly contacted to review CallMyWay policies and efforts to prevent the CallMyWay network from being used for illegal robocalling.

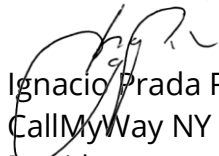
IV. Network Monitoring

CallMyWay is continuing development of custom software in-house that allows for real-time monitoring of traffic and will flag call patterns indicative of potential illegal robocalling. Additional capability is being added to the software which will automatically disable any subscribers associated with flagged call patterns.

V. Traceback and Enforcement Cooperation

CallMyWay will actively cooperate with the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG) to investigate and stop illegal robocalls. CallMyWay will dedicate sufficient resources to provide prompt and complete responses to traceback requests.

Best Regards



Ignacio Prada Prada
CallMyWay NY S.A.
President