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Introduction

SpectrumVoIP is committed to full compliance with the Federal Communications Commission (FCC) rules regarding robocall mitigation and the prevention of illegal robocalls. This document outlines SpectrumVoIP's comprehensive Robocall Mitigation Database (RMD) plan, designed to meet all FCC requirements, protect consumers, and maintain the integrity of telecommunications networks. The plan addresses the latest FCC rules, including updates mandated by the TRACED Act and related rulings.

SpectrumVoIP 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 Program

SpectrumVoIP utilizes call analytics software provided by TransNexus to monitor all voice traffic in real-time to prevent the transit of illegal robocalls. The TransNexus system alerts us if outbound calls are attempted where the calling number is invalid, unallocated, or on a Do Not Originate list. In addition, the TransNexus system alerts us to any unusual calling patterns indicative of robocalls for further investigation by one of our technicians.

When investigating suspicious calls or calling patterns, we will seek to identify the party that is using our network to originate, route or terminate these calls. Our investigation can include verifying that the originating customer owns (or is authorized to use) the caller ID number, suspending the offender's ability to originate or terminate calls on our network, and/or initiating a traceback investigation completed fully within 24 hours.

Furthermore, each customer is limited in the number of calls they are able to place concurrently based on their average usage and agreed upon number of call sessions. This prohibits any single SpectrumVoIP customer from placing high volumes of calls that would typically be associated with robocalling.

Lastly, Auto-dialing or "predictive" dialing (i.e., non-manual dialing or using a software program or other means to continuously dial or place outbound calls) is forbidden in our AUP.

Traceback Requests

SpectrumVoIP is committed to responding to traceback requests within 24 hours. SpectrumVoIP will cooperate with the proper authorities to investigate and stop any illegal robocallers that use our service to make calls. Upon receipt of a traceback request an internal support ticket will be opened with our risk mitigation team for immediate analysis and response.

If a traceback exposes an existing customer as the source of the fraudulent robocalls a demand for explanation and verification of mitigation is issued to the customer. If the fraudulent traffic is not mitigated, SpectrumVoIP will suspend service for the offending customer.

Traceback contact:

Jeremy Brock

jbrock@spectrumvoip.com

Know Your Customer

Each customer who signs a voice contract with SpectrumVoIP is vetted by collecting information such as the following:

- Physical Business Location
- State of Incorporation
- Federal Tax ID
- Nature of customer's business
- Customer's SSN, credit history, and business reputation
- Customer's right to use the telephone number presented on calls

In addition, the vast majority of our customers are direct sales, made face-to-face by a salaried SpectrumVoIP sales representative. Less than 10% are inbound leads and sold over the phone, and those undergo a rigorous credit check, and are installed by a SpectrumVoIP employee or certified contractor at their place of business. We do not simply ship equipment. For these reasons, we have a very effective "know your customer" process.

Contractual Provisions with End-users

All new and renewing customers are made aware of our AUP which states, users will be prohibited from originating unwanted calls with the intent to defraud, cause harm, or wrongly obtain anything of value from the called party. In addition, Auto-dialing or "predictive" dialing (i.e., non-manual dialing or using a software program or other means to continuously dial or place outbound calls) is forbidden. If any customer is found in violation of the company's robocall mitigation policy the end users will be notified of the violation and required to mitigate the violation or have their services suspended.

International Calling

SpectrumVoIP is not currently an international voice services provider. If at any time SpectrumVoIP does decide to sell our services to international customers using North American Numbering Plan resources, we will familiarize ourselves with and develop best practices for full vetting of such customers and work with our underlying provider to perform the necessary telephone number validation on all international originated calls.

Know-Your-Upstream-Provider

SpectrumVoIP knows all the carriers from which it sends or receives traffic, and only connects with well established, reputable vendors such as Bandwidth. We will monitor the status of these carriers within the Robocall Mitigation Database and will not accept traffic from those carriers that are removed. In addition, the filed Programs of these carriers have been reviewed by the Company to understand the specific steps a provider is taking to mitigate illegal robocalls.

RMD Certification and Contact Updates

As required, SpectrumVoIP will submit any necessary updates to the FCC RMD in the event of material changes to this plan, Company certification, identification information, or contact information to the Commission within 10 business days of the change. Updates will be signed by an officer of the company in conformity with 47 CFR 1.16