

TRUE ON INC. ROBOCALL MITIGATION PLAN

True On Inc. is a small/rural carrier eligible for the STIR SHAKEN extension granted to small voice service providers with fewer than 100,000 voice subscriber lines under 47 CFR § 64.6304.

True On Inc. has implemented the following Robocall Mitigation Plan to detect and prevent unlawful robocalls from originating on its network as of October 2021.

All calls that originate on True On's network are subject to the described robocall mitigation program.

True On Inc. blocks calls originating from numbers that are not valid North American Numbering Plan (NANP) numbers, known numbers not allocated to a provider and numbers not assigned to a True On Inc. subscriber or otherwise set aside for outbound call use. True On Inc. does not permit subscribers to place outbound calls from "unscreened" numbers. True On Inc. does not offer SIP trunking service. True On Inc. does not allow a customer to place an outbound call using a telephone number unless they have ported the telephone number to True On Inc., or else they have ordered a new telephone number provided exclusively by True On Inc.

Using vendor services, True On Inc. monitors long-distance originating network traffic for suspicious or abnormal call volume or activity. Long Distance Calls that meet the below qualifying factors are investigated internally to determine if the calls are legitimate or unlawful:

- High-volume voice network traffic
- Large bursts of calls in a short timeframe
- High-volume calls to premium destinations

When suspicious activity is detected, the Network Operations Center & Engineering Team is notified, who investigates suspicious outbound calling activity.

Traceback

True On Inc. puts a high priority on cooperation with traceback requests initiated by the FCC Authorized Industry Traceback Group. True On Inc. is committed to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to originate calls.

Customers are required to assist in traceback investigations. True On Inc. has a single point of contact designated to handle traceback requests and coordinate with outside investigations.

Know Your Customer Policies

True On Inc. services small and medium businesses. True On Inc. does not have VoIP wholesale customers. True On Inc. does not allow foreign entities (i.e., those based permanently outside the United States) to connect directly to the network to place outbound calls. However, US-based clients may travel to use services outside the United States in compliance with laws and regulations. To prevent spoofing, True On Inc. collects and verifies information for each commercial customer, including details such as the physical business location, contact persons, and federal tax ID. True On Inc. verifies government-issued identification for every customer.

Call Routing Policies and Reasonable Analytics

Legitimate robocallers who are placing calls in compliance with all regulations, including those placing outbound emergency notifications, appointment reminders, school, and church closing announcements, have notified True On Inc. of their intended use. True On Inc. has systems that prevent calls from being placed from numbers that are not active in the North American Numbering Plan.

Customer Inbound Nuisance Calling Prevention

True On Inc. offers features to subscribers that allow certain inbound nuisance calls to be blocked to reduce the amount of inbound calling, including telemarketing do not disturb and anonymous call rejection. True On Inc.'s subscribers can block calls from specific inbound calls using Selective Call Rejection.

Enforcement

If it is determined a True On Inc. customer is originating prohibited unlawful robocalls on our network, True On Inc. will either warn the customer to stop or terminate their service as allowed per True On Inc.'s policies that define the circumstances by which True On Inc. will suspend or terminate service to a customer.

Customer Education

True On Inc. posts information on its website www.transparentvoip.com to educate customers on how to protect themselves from becoming a victim of unlawful robocalls and a process to report complaints related to robocall activity.