



Robocall Mitigation Plan

Traceback Cooperation

- Linear 1 Technologies will cooperate in traceback investigations. To allow for timely and comprehensive law enforcement efforts against illegal robocallers, Linear 1 Technologies will dedicate sufficient resources to provide prompt and complete responses to traceback requests from law enforcement and from US Telecom's Industry Traceback Group. Linear 1 Technologies has identified a single point of contact in charge of responding to these traceback requests and will respond to traceback requests as soon as possible within 24 hours, excluding weekends and all major holidays.
- Linear 1 Technologies will require traceback cooperation. For all new and renegotiated service applications governing the transport of voice calls, our policy will specify the use of best efforts to require cooperation in traceback investigations by identifying the upstream provider from which the suspected illegal robocall entered its network or by identifying our own customer if the call originated in our network.

Subscriber Vetting Practices

- Residential and small business practices
 - o Linear 1 Technologies will vet residential and small businesses through normal business practices and will obtain billing address, primary residence, or business location.
- Commercial retail end-users
 - o Linear 1 Technologies will confirm the identity of commercial customers by collecting information such as physical business location, contact person(s), state or country of incorporation, federal tax ID, and the nature of the customer's business.
 - o Linear 1 Technologies has call detail records to determine typical call volume and potential reasons for significant deviations from the typical call volume. Linear 1 Technologies will determine if there are legitimate reasons for any customer to be making a number of high volume, short duration calls. Linear 1 Technologies will contact any commercial business within 24 hours of such deviations to determine if call volumes are legitimate.
- Wholesale Customers
 - o Linear 1 Technologies will be responsible for the resale providers who lease voice services from Linear 1 Technologies. Linear 1 Technologies has call records and will closely monitor for significant deviations from the typical call volume of the reseller. Linear 1 Technologies will contact resale provider within 24 hours of such known deviations to determine if call volumes are legitimate. Linear 1 Technologies will rely on vetting practices of the resale provider, as resale provider is responsible to the end user voice customer. Linear 1 Technologies will provide wholesale services to Linear 1 Technologies Internet Service Provider. Linear 1 Technologies

Internet Service Provider will lease the loop and switching from Linear 1 Technologies. Linear 1 Technologies Internet Service Provider will provide VoIP services to the end user.

Telephone Number Validation Practices

- Telephone Number Validation is necessary and appropriate when an End-User's right-to-use the telephone number is unknown to Linear 1 Technologies. Linear 1 Technologies will validate as necessary and appropriate. International Practices
- Linear 1 Technologies will continue to monitor best practices and implement as needed.

Ongoing Mitigation Practices

- Linear 1 Technologies will investigate suspicious calls and calling patterns. If Linear 1 Technologies detects a pattern consistent with illegal robocalls, or if Linear 1 Technologies otherwise has reason to suspect illegal robocalling or spoofing is taking place over our network, Linear 1 Technologies will seek to identify the party that is using our network to originate, route, or terminate these calls and take appropriate action. Taking appropriate action may include, but is not limited to, initiating a traceback investigation, verifying that the originating commercial customer owns or is authorized to use the Caller ID number, determining whether the Caller ID name sent to a receiving party matches the customer's corporate name, trademark, or d/b/a name, terminating the party's ability to originate, route, or terminate calls on its network, and notifying law enforcement authorities.

Linear 1 Technologies originated Inter-Carrier TDM traffic uses third-party services that uses analytics, reporting and alerts to identify suspected illegal robocalls from originating on our network. We will investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If we determine that the caller was attempting to originate unlawful robocalls, then we take corrective action immediately. Examples of analytics typically used to identify illegal robocalls as part of third-party services are as follows.

- Invalid Calling Number format
- Calling Numbers within number blocks that have not been assigned by the Number Pooling Administrator for use by any carrier
- Unassigned area codes
- High risk calling numbers

Linear 1 Technologies contact information

Scott Verbus, CEO/Owner, 614-602-4222 scott@linearit.net