



MEDTEL COMMUNICATIONS LLC ROBOCALL MITIGATION PLAN

Medtel Communications LLC has implemented STIR/SHAKEN across our network and remains committed to STIR/SHAKEN regulation. We certify that all calls that originated on our network are subject to a robocall mitigation program.

We certify Medtel Communications LLC, or any affiliated entity has not been subject to a Commission or other law enforcement agency action or investigation in the prior two years due to suspected involvement with illegal robocalling or spoofing, or due to a deficiency in its RMD certification.

This plan will be submitted to the FCC's Robocall Mitigation Database and will be adapted to adjust to the latest laws, regulations, and industry best practices.

Know Your Customer

New customers are required to provide the following company information:

- Company name
- Business address
- Business activities
- Authorized person including name, phone number and email
- How they plan to use the phones
- Verification that they will not use our services for robocall

All new customer applications are manually reviewed and approved to ensure legality.

Know Your Upstream Carrier

Medtel Communications LLC works with reputable upstream carriers to verify compliance with robocall mitigation requirements.

We conduct upstream carrier reviews annually to ensure all upstream carriers are listed as compliant FCC Robocall Mitigation Database.

Traffic Monitoring

Medtel Communications LLC Inc has monitoring and reporting systems in place to analyze voice network traffic to identify patterns consistent with robocalls.

Our monitoring systems provide alerts on calling patterns with unusual spikes, traffic patterns, or attempted use of non-validated Telephone Number to detect patterns consistent with illegal robocalls.

We support a real time query to service to determine if a number originating on your network could be a robocall. For each suspected instance of robocalling, we receive an alert in near real time. This alert will result in us manually blocking the service until further review.

Specifically, we manually review following criteria to identify possible robocalls:

- Calls per minutes
- Calls per day
- Call date/time inconsistent with buyer's business profile



- Referencing of call history logs and patterns
- Outbound concurrency limits on all channels to monitor for fraud and suspicious activity
- Number of answered outgoing calls that have a short duration
- Number of answered outbound calls to the total number of outbound call attempts ratio
- Are those random numbers or current existing customers numbers
- Verification of that the calls are coming from a valid IP
- When an alert is received, our engineering staff immediately reviews such an alert manually
- If customers end points are registering from a VPN or an overseas IP, a personal call is made the customer's authorized person to understand the business rationale to use a VPN or overseas IP

Robocall Device

Medtel Communications LLC Inc does not provide robocall devices to any customers.

Caller ID Spoofing

Medtel Communications LLC Inc will provision the outgoing caller ID only if the customer owns the phone number.

Termination of Services

If the platform detects a suspected robocalling patterns, Medtel Communications LLC Inc will take appropriate action which may include suspending or terminating the subscriber.

Such calls can be blocked, or the terminating party can be notified via CNAM.

Traceback Cooperation

Medtel Communications LLC retains CDR data for at least 1 year.

Medtel Communications LLC Inc is fully committed to responding traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG) in 24 hours.