

Robocall Mitigation Plan - Telewebtech LLC

Telewebtech LLC provides mobile applications and fixed base PBXs that, among other functions, enable end users to communicate via voice and SMS with other real phone numbers.

All voice and messaging traffic originates from end users using our mobile applications and we do not provide any API access or other direct access to the underlying voice or messaging infrastructures.

Our voice and messaging implementations are provided by underlying vendors.

STIR/SHAKEN

Telewebtech relies on underlying vendors to provide voice infrastructure via telephone numbers hosted at those vendors. As of March 2024, all calls originated by our end users transit through our vendors' voice infrastructures and all of those calls are signed by our vendors's STIR/SHAKEN implementation.

Our upstream voice provider(s) have fully implemented STIR/SHAKEN. Because we only permit users to initiate calls using telephone numbers hosted with our upstream voice providers (and only the subset assigned to that user), all outbound calls will adhere to STIR/SHAKEN requirements.

Robocall Mitigation Measures

Robocall mitigation is accomplished with the following measures:

- 1) Only authenticated and authorized users may use our mobile applications. All users are required to successfully verify an email address and complete a contractual agreement with us, which effectively guarantees that the end user has verified an account with Telewebtech.
- 2) Each user may have one or multiple phone numbers assigned exclusively to their account. These phone numbers are provisioned via, or hosted by, our immediate voice providers. We do not provide direct access to the voice or messaging infrastructure; all access is via our mobile applications, and cloud based individual business PBXs.
- 3) Our mobile applications, and thus our implementation, does not provide any capability to spoof a caller ID, spoof a calling number, automate responses to text messages (with the exception of an auto-responder throttled to 1x/hour), automate calling, nor provide audio to a call beyond what the user can speak into the device's microphone.

4) A user must manually dial a call or select a contact to dial. There is no automation capability provided in the mobile applications.

5) Calls are passed directly to our immediate voice provider

6) We have no downstream voice providers, nor do we provide any access to voice infrastructure beyond using our mobile applications.

7) Prior to using our service, users must agree to our terms of service and acceptable use policy. These terms prohibit the use of our service for illegal purposes including various forms of abuse, spam, and robodialing. Additionally, users are prohibited from attempting to automate use of our services.

As all calls from our network are dialed manually by a human and automation is not possible, the likelihood of robocalling is significantly reduced. However, we also monitor our traffic for patterns and act to immediately restrict or terminate the accounts of end users who exhibit abusive behavior or behavior that does not match that expected of a human dialer.

Traceback commitments

Telewebtech LLC. commits to responding within 24 hours of receiving a traceback request from the Commission, law enforcement, or the traceback consortium. We will fully cooperate to help investigate and stop any illegal robocallers that originate calls from our service.