

SkyPBX, LLC.

Robocall Mitigation Plan

1. Introduction

Company Overview:

SkyPBX is a VoIP provider that specializes in VoIP and school intercoms. We use SINCH as well as Bandwidth for outbound calls. SINCH takes care of all of our orig calls and houses all our TNs

Purpose of the Plan:

This document is to explain how our calls are routed and the mitigation steps we have in place to prevent robocalling and bad call traffic.

2. Measures to Prevent Customers from Originating Illegal Robocalls

Policy Enforcement:

Our customers are not able to make calls out from our network that do not have a valid caller-id. This caller ID has to be owned by us for a user to place an outbound call. This is to prevent number spoofing.

Customer Vetting:

Customers are onboarded to SkyPBX by a physical walkthrough of the school or business to make sure they are a good fit for our company. We also install all of our customers' phones and services on site. We are a local company and all of our customers are local to us.

Monitoring and Compliance:

We have rules in place that prevent calling from our phones with numbers that are not in our inventory. Users are not able to spoof numbers. They are only allowed to show the

numbers that they have in service with us. No other numbers can be used. We have concurrent call limits in place to prevent mass dialing from our services. Users are not able to dial out of country unless they place a support ticket with us to enable the dialplan. When they are done with the call the dialplan is disabled.

3. Know-Your-Upstream-Provider Program

- Provider Verification:

SINCH formerly inteliquent has ensured us that they have it in place. We have obtained a certification from Neustar that they have placed on our account to sign calls. We also see on many calls from them to us that when a call does not pass verification or it is a robo they place a ROBO in front of the caller ID to let us know.

4. Compliance and Reporting

We have reporting and alerts in place on our CDR viewer that will notify us of unexpected high call volume as well as high short call duration and multiple call hangups by called party. We use a service call VoIP Monitor for this.

5. Conclusion

SkyPBX will continue to do whatever necessary to be in compliance with the FCC's Robocall Mitigation Plan.