

Tadiran Telecom, Inc.

Robocall Mitigation Plan

STIR/SHAKEN IMPLEMENTATION

Tadiran Telecom, Inc. ("Tadiran" or "Company") is a small voice service provider and is therefore exempted from requirements of 47 CFR 64.6301 through June 30, 2023, per 47 CFR 64.6304 – Extension of implementation deadline.

ROBOCALL MITIGATION

Background

The FCC Order lists three affirmative obligations for voice service providers: (1) Respond to traceback requests from the Commission, civil and criminal law enforcement, or the Industry Traceback Consortium; (2) Take steps to effectively mitigate illegal traffic when it receives notification of such traffic from the Commission through its enforcement bureau; and (3) implement effective measures to prevent new and current customers from using its network to originate illegal calls.

1. **Traceback:**

If the Company receives a subpoena and has access to the call history, the Company provides the information to the respondent. If the Company does not have access to the call history, the Company will contact its underlying carrier/partner and request that the call history be provided.

Traceback Contact Information

Name	Title	Contact Information
Lindsay Kintner	SVP and GM	Email: Lindsay.kintner@tadiranamerica.com Phone: +1(678)506-7259

2. **Steps to Mitigate Illegal Traffic:**

The Company has an Acceptable Use Policy which describes the steps the company will take to mitigate illegal traffic. The relevant portion reads as follows:

Acceptable Use Policy ("AUP"). Voice Services. Tadiran reserves the right to periodically review usage levels of its Aeonix4Cloud service plans, or any other voice service offered by Tadiran from time to time, to ensure that you are not using such service in violation of this AUP. If such an abuse or violation is discovered, Tadiran shall have the right to terminate or adjust the plan as appropriate. All Customers agree to use Aeonix4Cloud plans for traditional voice or fax call of a duration comparable to that of the average small to medium business customer presently utilizing Aeonix4Cloud service and will not employ methods, devices or procedures to take advantage of unlimited plans by using the voice or fax services excessively or for means not intended by Aeonix4Cloud. Except for authorized Tadiran Resellers, no resale of Aeonix4Cloud or other voice services is permitted.

Excessive use is defined as use of a Product or Service that substantially exceeds the average call volume or duration used by all other customers of that Product or Service. Without limiting the generality of the foregoing, the following types of services are specifically prohibited and may not be accessed through Aeonix4Cloud voice service plan: monitoring services, data transmissions, transmission of broadcasts or transmission of recorded material. Tadiran may terminate your service or change your service plan if, in its

sole discretion, Tadiran determines that your use of Aeonix4Cloud plan violates this prohibition or is otherwise “unreasonable” or results in abuse of the service plan.

With respect to Customers of Aeonix4Cloud services, we consider your use of our Aeonix4Cloud plan to be “unreasonable” and therefore subject to immediate termination if you:

- re-sell, re-brand, re-supply, re-market or commercially exploit our Aeonix4Cloud Service, without our written consent, in order to aggregate traffic from more than one customer over a line or trunk;
- set up routing functionality such that only outbound long-distance traffic is sent over Aeonix4Cloud or engage in any other conduct which is fraudulent or results in significant network congestion, or degradation.
- We consider your use of our Aeonix4Cloud plan to be “abusive” and subject to immediate termination or adjustment if you utilize:
 - Autodialing
 - Continuous, repetitive or extensive call forwarding
 - Continuous call session connectivity
 - Fax broadcasting
 - Fax blasting
 - Robocalling
 - Telemarketing
 - Any other activity that would be inconsistent with reasonable small to medium business patterns, causes network congestion, or jeopardizes the integrity of Tadiran Telecom, its Aeonix4Cloud network, or other Tadiran facilities.

Lawful purposes only. You may use our Products and Services for lawful, proper and appropriate purposes. You may not use any Tadiran Product or Service in any way that is interfering with our ability to provide service to you or other customers or that is intended to avoid or has the result of avoiding your obligation to pay for your Products and Services within the time frame designated for payment.

You may not use any Tadiran Product or Service to threaten, abuse, harass, defame, deceive, defraud, interfere or invade another’s privacy or engage in any similar behavior.

3. Measures to prevent origination of illegal calls:

Know Your Customer:

The Company performs a thorough credit check on each of its customers and verifies the following information: legal business name, legal form of business, federal tax ID, nature of the business, primary contact person, and service address.

Telephone Number Validation:

As noted above, the Company verifies the identity of its customer prior to allowing them to obtain service and numbers.

Network Monitoring:

The Company will rely on its underlying carrier partners to give notice if Robocalls are detected.

Call Blocking:

The Company will work with its underlying service providers to block calls originating from its customers if necessary due to fraudulent activity. The Company will issue a request to the underlying carrier to block illegal calls.

AFFIRMATION

Tadiran submits this Robocall mitigation plan to comply with the Federal Communications Commission's Fourth Report and Order (FCC 20-187). This plan is a work in progress and will be supplemented as the company gains more exposure to and experience with these processes.

In the meantime, Bandwidth our ITSP provider, is providing the following attestation service:

1. Outbound calls from Bandwidth customers using Bandwidth U.S. phone numbers are signed with "A" or full attestation.
2. Outbound calls from Bandwidth customers using non-Bandwidth U.S. phone numbers are signed with "B" or partial attestation.
3. Bandwidth will not currently sign any calls with "C" or gateway attestation.