

Robocall Mitigation Plan

September 2021

1. Introduction

Recent regulatory and enforcement activity by Congress, the Federal Communications Commission (FCC), Federal Trade Commission (FTC), and by private industry groups such as the Industry Traceback Group (ITG) and SOMOS all highlight problems arising from abusive and fraudulent robocalls targeting or otherwise impacting American consumers, businesses and government agencies. This robocall mitigation plan follows guidance provided by regulatory agencies and industry groups to assist with the identification and mitigation of actual or suspected unlawful robocall traffic.

2. Acceptable Use Policy (AUP)

Ton80 Communications, LLC has adopted this Acceptable Use Policy ("AUP") for itself and its subsidiaries, including Ton80 Communications, LLC, in order to encourage the responsible use of Ton80's networks, systems, services, and products (collectively, "Ton80 Services") by our Customers, Customers' end-users and customers, and other users of Ton80 Services (collectively, "Users"), and to enable Ton80 to provide Users with secure, reliable and productive services. Ton80 will review and update AUP, as needed, on an annual basis.

Our AUP can be viewed at:

3. Know Your Customer Policy

Our initial customer intake form and procedures require detailed business information such as TIN/EIN and USAC registration number, and for existing customers to confirm their information. Our sales team is trained to ask more probing questions about the nature of their calls and request additional information. We also inquire whether the Customer generates autodialer traffic or engages in telemarketing and/or has customers which generate autodialer traffic or engage in telemarketing and whether the Customer or any affiliate is under

investigation or being sued by the FCC, FTC, or state AG for alleged violations relating to autodialer or telemarketing traffic.

4. STIR/SHAKEN

Ton80 is implementing STIR/SHAKEN and will only accept off-network traffic for termination from third-party carriers that are in the Robocall Mitigation Database after September 28, 2021.

5. Monitoring and Blocking

Ton80 continuously monitors traffic and blocks suspected unlawful traffic fraudulent traffic, including robocalling, traffic pumping, and international toll fraud in consistence with customer contracts and applicable law. Based on Operations' experience with Customer, Sales and Legal will confer to consider whether to suspend service and/or terminate existing customer contracts.

6. Inquiries

As a member of the Communications Fraud Control Association (CFCA), we are dedicated to loss prevention and combating the growing problem of fraud in telecommunications. Our process and policies ensure all subpoenas, traceback requests, and carrier and end-user complaints, are responded to timely and maintain a list of all entities named in connection with suspect traffic.

7. Plan Update Information

Due to the changing nature of our industry and regulatory requirements, this plan is subject to change at any time and such changes will be communicated as necessary.