

Unique Soft LLC Robocall Mitigation Policy

Robocall Mitigation Policy Statement. UNIQUE SOFT LLC fully supports the efforts by the various Federal, State, and local regulatory agencies to protect consumers and help rid the USA of the scourge of illegal robocalling and calls that violate TCPA rules by implementing the following policies and procedures summarized here and detailed below. We are strictly following below mentioned Robocall Mitigation Policy and procedures and we have not received any tracebacks from ITG or any complaints from our service providers in last two years.

- **Choosing the Right Customer.** We make sure to choose right customer to eliminate fraud and misuse of services
 - a. We offer services only to **Enterprise Call / Contact Center**, we don't offer services to wholesale resellers and aggregators, who do not know their underlying customers directly. We offer services only to Enterprise and contact center who can establish a reason for their calls and have subscribers, users, customers.
 - b. Calls will only pass from our network if customers are using our DIDs as CLI/ANI for outgoing calls, this policy eliminates any chance of CLI spoofing, eliminates any use of invalid CLI, eliminates any use of wireless numbers as CLI.
 - c. All our customers are using our Cloud PBX and Contact center software as communication software so the possibility of CLI spoofing, use of invalid CLI and wireless ANI is not possible. Also, in such a controlled environment chances of fraud and any misuse are rare.
- **KYC.** Force strict and thorough Know Your Customer (KYC) protocols and practices to help prevent bad actors from becoming UNIQUE SOFT LLC customers and perpetuating their fraud on the UNIQUE SOFT LLC Network.
- **Know your customers' traffic (KYCT).** Traffic is not allowed to ramp-up from a new customer until we have analyzed such traffic to make sure it's following robocalling, telemarketing and TCPS rules & regulations.
- **Provisioning.** All new customers and existing customers participating in short duration robocalls will be set-up with separate trunk groups and monitored much more closely than conversational customers.
- **Stir/Shaken.** We are not offering services to aggregators and wholesalers and all our users are using DIDs provided by us, and our provider is signing calls with A-Level attestation.
- **ITG Compliance.** UNIQUE SOFT LLC will fully cooperate with the Industry Traceback Group (ITG) promptly on all traceback requests to help identify bad actors.
- **TCPA & Telemarketing Sales Rule Compliance.** UNIQUE SOFT LLC will not willfully assist customers in violating the Telephone Consumer Protection Act (TCPA) and other laws designed to protect consumers from unwanted and/or illegal robocalls.
- **Monitoring.** Using filtering systems, calls are monitored to identify calling patterns consistent with fraud for follow-on action to eliminate it from our network without regard for potential revenue loss.
- **Repeat Offenders.** Customers who continue to be responsible for tracebacks and do not take corrective action to address fraudulent call patterns will be terminated on second occurrence.
- **Law Enforcement Notification.** Notification will be sent to the appropriate law enforcement authorities on Customers who are purposely sending illegal robocalls.

1. Definitions: For purposes of these policies, procedures and protocols, the following definitions shall apply.

- a. **"Aggregator"** shall mean an FCC licensed long distance telecom carrier with a 499 Filer ID and a RMD FRN number who sells USA termination on a wholesale basis to other such as long-distance carrier.
- b. **"ANI"** means the originating phone number of a call.
- c. **"Conversational Traffic"** shall mean long distance traffic that averages 60-seconds or longer.
- d. **"Caller ID Spoofing"** means when a caller deliberately falsifies the phone number transmitted to the caller ID number shown on a person's phone display to disguise their identity, oftentimes to defraud consumers.
- e. **"DNC"** means the Do Not Call list consumers use to register their phone numbers to avoid sales and marketing related calls that are unwanted.
- f. **"DNIS"** means the called to party on a call.
- g. **"DNO List"** means calls originating from a list of known phone numbers that are for inbound calling only which are spoofed by bad actors to fool customers into believing they are getting calls from the company who owns

such phone number.

- h. **“Enterprise Call / Contact Center”** means a foreign or USA based call or contact center that is not engaged in selling USA terminating minutes to carriers, resellers, or aggregators.
- i. **“FRN number”** means the registration number assigned to a carrier, reseller, or aggregator by the RMD.
- j. **“KYC”** shall mean Know Your Customer and the process for doing so to screen out bad actors before they send illegal traffic over our network.
- l. **“KYCT”** shall mean Know Your Customer’s Traffic and the process for doing so for the purpose of analyzing traffic for illegal calls before allowing full customer production traffic to commence on our network.
- m. **“Pre-production & Test Traffic”** means the initial customer traffic and limited small volume production traffic sent over the UNIQUE SOFT LLC Network for purposes of analyzing such traffic for potential fraud and violation of various laws.
- n. **“Production Traffic”** means Customer traffic being sent to the UNIQUE SOFT LLC Network that represents normal daily traffic volumes the Company can expect to receive.
- o. **“RMD”** shall mean the FCC’s Robocall Mitigation Database.
- p. **“Short Duration Traffic”** shall mean long distance traffic that averages less than 12-seconds in length.
- q. **“Filtering Systems”** means software systems that help to identify numerous types of suspicious and illegal calling activity by dipping up to 15 different and ever-changing databases which identify calls with a high probability of fraud or outright fraud.
- r. **“Reseller”** means a licensed USA carrier, with a FCC 499 Filer ID and a RMD FRN number who offers USA termination to call or contact centers in the USA or abroad but who does not offer service to other carriers, resellers or aggregators.
- s. **“TCPA”** means the Telephone Consumer Protection Act which specifies rules for sending calls to US consumers which must be followed by callers and carriers allowing calls to traverse their networks.
- t. **“The UNIQUE SOFT LLC Network”** shall mean the Company’s switching platform and underlying carriers it uses to terminate traffic to the USA and internationally.
- u. **“TSR”** means the Telemarketing Sales Rule which specifies rules for sending calls to US consumers which must be followed by callers and carriers allowing calls to traverse their networks.

2. Traceback Investigation Compliance Policy:

- a. **Full Cooperation.** UNIQUE SOFT LLC will comply with all Traceback investigations initiated by the Industry Traceback Group (ITG) and will provide all information requested.
- b. **Dedicated Point of Contact.** UNIQUE SOFT LLC has registered the following group and their contact information and business hours to receive Traceback investigation requests.

Name: Mohit Mishra

Department: Support Head

Email: mohit@uniquesoftsol.com

Contact Number: + 16265667214

- c. **Filters.** All filters will be set to the highest levels, initially, despite potential revenue loss, until our KYCT protocols prove they can be relaxed. Foreign originating traffic is giving the highest level of scrutiny to help stop illegal robocalls from entering the USA.

3. KYC Onboarding: UNIQUE SOFT LLC is committed to protecting USA consumers by blocking suspected illegal robocalling by carefully vetting each new prospective customer to eliminate bad actors, upfront, before they have a chance to pass illegal robocalls and other illegal calls that would violate TCPA rules before allowing their traffic to traverse the UNIQUE SOFT LLC network. All prospective new customers first must fill out and sign UNIQUE SOFT LLC's KYC form which will be vetted, verified, and approved prior to such potential customer being presented with a Company contract, provisioning form, and being allowed access to the UNIQUE SOFT LLC Network. The following table specifies the KYC requirements for onboarding new customers depending upon whether the customer is a USA or foreign based carrier.

UNIQUE SOFT LLC KNOW YOUR CUSTOMER POLICY CHECKLIST		USA BASED		FOREIGN BASED	
	KYC REQUIREMENT by NEW CUSTOMER TYPE	WHOLESALE CUSTOMER	ENTERPRISE CALL CENTER	WHOLESALE CUSTOMER	ENTERPRISE CALL CENTER
1	Check if KYC form is complete and filled out correctly. Search Applicant name & owner on Google, LinkedIn and confirm details	Service not provided	✓	Service not provided	✓
2	Confirm Applicant website is functioning, and links are active.	Service not provided	✓	Service not provided	✓
3	Confirm Applicant's website logo is not cloned by using 3 rd party website	Service not provided	✓	Service not provided	✓
	www.images.google.com				
4	Confirms Applicant's website domain age using 3 rd party software	Service not provided	✓	Service not provided	✓
	www.whois.com				
5	Confirm Applicant's PBX or manual dialer IP Address using 3 rd party website for blacklist designation	Service not provided	✓	Service not provided	✓
	www.abuseipdb.com/check/207.246.84.98				
6	Confirm Applicant's company address using 3 rd party service by Google Maps	Service not provided	✓	Service not provided	✓
7	Confirm and verify Applicant's FCC 499 Filer ID, Company name and contact information using 3 rd party website	Service not provided	N/A	Service not provided	N/A
	https://apps.fcc.gov/cgb/form499/499a.cfm				

8	For US Applicants search information on the Secretary of State website Date of customer's company formation. Companies less than 6- months old rejected.	Service not provided	✓	Service not provided	N/A
9	For foreign based Applicants, company formation and company owner/CEO and other details are searched on different third-party websites and foreign government websites if information is available and, to verify details provided by customer earlier.	Service not provided	N/A	Service not provided	✓
10	Verify Applicant's Robocall Mitigation Database registration using 3 rd party website for existence and completeness	Service not provided	N/A	Service not provided	N/A
	https://fccprod.servicenowservices.com/rmd?id=rmd_listings				
11	Verify Applicant's FCC Registration Number using 3 rd party website	Service not provided	N/A	Service not provided	N/A
	https://fccprod.servicenowservices.com/rmd?id=rmd_listings				
12	Verify Applicant's Stir/Shaken implementation by using 3 rd party website	Service not provided	N/A	Service not provided	N/A
	https://fccprod.servicenowservices.com/rmd?id=rmd_listings				
13	Search Applicant's contact name in Google with keyword as "FCC" or "FTC" to find any complaints, investigations, or lawsuits and disposition thereof.	Service not provided	✓	Service not provided	✓
14	Check Applicant's provided carrier (current providers of applicant) references to verify Applicant company and contact names and traceback history	Service not provided	✓	Service not provided	✓
15	Determine Applicant's IP address Geo Location using 3 rd party website www.ipinfo.io for use of foreign IP address.	Service not provided	✓	Service not provided	✓

- 4. Know Your Customer's Traffic (KYCT) for New Customers.** For all new customers, and as part of the Company's KYC Policy, and as an added method for vetting customers, upfront, before full production traffic is processed over the UNIQUE SOFT LLC Network, the Company's Traffic Analysis team will monitor customer test and pre-production traffic for suspicious calling patterns consistent with illegal robocalling and also for calls that are in violation of Federal and State laws for telemarketing and for consumer protection. Customers whose traffic is shown to be in violation of such laws, will be prohibited from sending production traffic, and may be prohibited from sending further test and/or pre- production traffic before such new customer is allowed to send full production traffic.
- 5. New Customer Set-Up Policies.** To mitigate the potential for illegal traffic entering the UNIQUE SOFT LLC network by new customers who have somehow been able to get past our KYC scrutiny, the following steps will be taken as part of our KYCT protocols. All filters will be set to the highest levels, initially, despite potential revenue loss, until our KYCT protocols prove they can be relaxed. Foreign originating traffic is given the highest level of scrutiny to help stop illegal robocalls from entering the USA.
1. Neighbor Spoofing – blocked
 2. Local Do Not Originate - applied
 3. Wireless ANI origination- not possible from our network as customers can only use DIDs provided by us.
 4. Toll-Free Do Not Originate – Toll free origination not allowed.
 5. Do not call (DNC) filter is active.
- 6. New Customer Stir/Shaken Configuration** - New trunk groups are required to have the following settings depending upon Customer Type and whether Customer is based in the USA or internationally. This is required due to the different levels of monitoring attention and call filtering levels to help mitigate illegal robocalling traffic on the UNIQUE SOFT LLC Network and to attest for such calls to help the industry identify bad actors.

NEW CUSTOMER CONFIGURATION RULES		USA ORIGINATING IPs		FOREIGN ORIGINATING IPs	
ITEM NO.	STIR/SHAKEN REQUIREMENT BY NEW CUSTOMER TYPE & DID PROVIDER	WHOLESALE CUSTOMER	ENTERPRISE CALL CENTER	WHOLESALE CUSTOMER	ENTERPRISE CALL CENTER
		Service not provided		Service not provided	
1	Stir/Shaken Attestation Level for UNIQUE SOFT LLC provided DIDs:		A Level Attestation		A Level Attestation
2	Stir/Shaken Attestation Level for 3rd party DIDs for calls that came in unsigned:	Calls will not pass; third party DID can't be used as ANI/CLI			
3	Stir/Shaken Attestation Level for 3rd party DIDs for calls that came as signed:	Calls will not pass; third party DID can't be used as ANI/CLI			

7. **Traceback Compliance Policy & Procedures.**

- a. **Prompt Response to ITG.** UNIQUE SOFT LLC’s Traceback Group shall strive to complete its investigation within 4-hours of receipt of such Traceback request and return the results within 24-hours back to the ITG.
- b. **Follow-on Actions:**
 - i. Traceback will be forward to the UNIQUE SOFT LLC account manager for follow-up with the Customer.
 - ii. UNIQUE SOFT LLC account manager will act as defined below to mitigate the traffic source.
 - iii. Response communications between UNIQUE SOFT LLC & Customer will be documented in our ticketing tool.
- c. **Existing Accounts** that are more than three months old are limited to below Traceback policy.
 - 1. Customer agrees to provide a screenshot of Traceback Group’s notice showing offending underlying customer name. If such an underlying customer is also a direct customer of UNIQUE SOFT LLC, the same two Strike Policy & Procedures are invoked.
 - 2. The customer agrees, in writing, to remove offending underlying customer’s traffic from being routed to UNIQUE SOFT LLC, they will be required to sign a Compliance Statement of Corrective Action.
 - 3. Customer may be required to groom its traffic to further mitigate the potential for tracebacks.
 - 4. Customer shall pay fines as required per incidence of Traceback.
 - 5. For second offense customers, they will be blocked permanently.

EXISTING ACCOUNT POLICY & PROCEDURES ON TRACEBACKS			
STRIKE	TIME PERIOD	SUSPENSION	CUSTOMER REMEDY(S)
1	1 st traceback	Immediate and for 7-days after customer remedy compliance	Customer must agree to specific disclosure of information and corrective action & pay required fine
2	2 nd Traceback	Permanent	Not available

- a. **New Accounts** that are less than 3-months old are limited to a “Two Strikes & You’re Out” Traceback & TCPA Violation policy as follows:

NEW ACCOUNT POLICY & PROCEDURES ON TRACEBACKS			
STRIKE	TIME PERIOD	SUSPENSION	CUSTOMER REMEDY(S)
1	1 st traceback	Immediate and for 15-days after customer remedy compliance	Customer must agree to specific disclosure of information and corrective action & pay required fine
2	2 nd Traceback	Permanent	Not available

8. **Proactive Illegal Robocall Mitigation Policy & Procedures:**

- a. Account traffic is subject to ongoing regular random inspection. Calls found with fraud or calls in violation of TCPA & Telemarketing Sale Rules laws are reported to Customer for correction or possible suspension for non- compliance.
- b. First communication to customers for non-compliant calls will ask for corrections and verification of such correction has been fulfilled. Subsequent calls are subject to service interruption in the event of frequent offenses and/or perception by UNIQUE SOFT LLC that customers’ intentions are not genuine.
- c. Customers found to have a recent traceback reported by another carrier besides UNIQUE SOFT LLC will not be on-boarded and services will not be provided.
- d. Email blasts will be sent to customers periodically as needed to keep customers up to date on current

or changing TCPA & Illegal Robocall Mitigation rules and best practices.

- 9. Proactive Telemarketing Sales Rule & TCPA Compliance Protocols.** Customer traffic is subject to filtering and analysis by UNIQUE SOFT LLC's Filtering Systems for illegal or suspicious activities.
- Spoofed ANI – This scenario is not possible with our network as calls will only pass if customer/end users use our DIDs assigned to them as ANI.
 - Short duration calls using automated dialing machines not allowed as all customers using our PBX and other calling solutions to make manual calls.
 - Short Duration calls – not allowed, our system will automatically block calls if end user, customer or contact center sending short duration calls.
- 10. DID Ordering Qualifications:** Given that tracking of a DID's/ANI's reputation is a key part of identifying illegal robocalling and bad actors, and given's UNIQUE SOFT LLC's desire to not circumvent such monitoring systems by allowing customers to acquire a fresh DID that will take time to establish a bad reputation, DIDs will only be issued to vetted enterprise call center customers and resellers—not to aggregators for use in robocalling. UNIQUE SOFT LLC will not offer such DID services wholesale carrier customers who are aggregators who do not know their underlying customers directly.
- 11. Reporting to Authorities:** Customers who have shown themselves to be knowingly ignoring or violating Federal and State laws will be reported to the necessary Federal, State, or local government agency responsible for enforcement of such laws.

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