

DESCRIPTION OF ROBOCALL MITIGATION PROGRAM

As part of our submission to the Robocall Mitigation Database, this document describes (1) the specific reasonable steps we have taken to avoid originating illegal robocall traffic as part of our robocall mitigation program, (2) our participation as a member of a working group, industry standards group, or consortium that is working to develop a non-internet Protocol caller identification authentication solution, and (3) our commitment to respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

I. ENTITIES COVERED BY CERTIFICATION

The following entities are all subject to the robocall mitigation policies and procedures described in this document:

Steven Khasky Consulting

iDataWorks

Heritage Animal Hospital

South Valley Drywall

Aklam Inc

II. EFFORTS TO AVOID ORIGINATING ILLEGAL ROBOCALLS AS PART OF THE ROBOCALL MITIGATION PROGRAM

We have made meaningful investments to implement network upgrades and offer new features to combat illegal robocalls as part of our robocall mitigation program. We deploy

multiple systems to detect potential robocall activity based on statistics such as average call duration, Answer Seize Ratio (“ASR”), and call count carrier/consumer reports.

III. Know Your Customer Program

We have established and implemented comprehensive Know Your Customer (“KYC”) policies for any new and existing customers. The objective of the KYC policy is to prevent us from being used, intentionally or unintentionally, for spoofed or illegal traffic. KYC procedures enable us to know and understand our customers and their use policy better, which in turn helps us manage unacceptable traffic.

IV. COMMITMENT TO RESPONDING TO TRACEBACK REQUESTS

We are committed to responding fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperating with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.