

1 Point Communications LLC

Robocall Mitigation Plan

Introduction

This document details the reasonable steps and actions taken by 1 Point Communications LLC to mitigate and eliminate illegal robocalling. 1 Point Communications LLC has an ongoing commitment to scan for and help alleviate illegal robocalling by pre-qualifying prospective customers, monitoring existing customers for traffic patterns indicative of prohibited robocalls, and working with other providers and regulatory agencies in combatting fraudulent voice activity.

1 Point Communications LLC uses SIP termination/origination services. 1 Point Communications LLC is fully STIR/SHAKEN implemented, and we have our own Token. Our OCN is 637K.

Know Your Underlying Provider

1 Point Communications LLC has master service agreements with our upstream providers Bandwidth.com and VoIP Innovations and has received written assurances from their officials that will abide by the FCC's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice services to 1 Point Communications LLC. 1 Point Communications LLC and its upstream providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Know Your Customer

Screening interviews are performed to understand potential customer business models and the potential, or lack thereof, for involvement in fraudulent robocalling schemes.

In our research of the prospect, 1 Point Communications LLC will not activate clients that provide anonymous information or where data mismatches are found. Additionally, prospects are required to agree to 1 Point Communications LLC's strict policies and contractual terms prohibiting the act of fraudulent voice activity as a condition of doing business with 1 Point Communications LLC.

Individuals associated with prospects or current customers who have been known to act improperly or otherwise be involved in fraudulent robocalling will cause their companies to be rejected by 1 Point Communications LLC as a customer and any existing customer relationships could potentially be severed.

Traceback Requests

1 Point Communications LLC is committed and will respond fully within 24 hours to all Traceback Requests from the FCC, law enforcement agencies, and the industry traceback consortium and vows to cooperate with these agencies in investigating and stopping any illegal robocallers that use our service to make calls. 1 Point Communications LLC will devote sufficient resources to

provide prompt and complete information to traceback requests. Our point of contact to handle all traceback requests is:

Jamous Bitrick
Network Engineer
540-627-6500

If a traceback exposes an existing customer as the source of fraudulent robocalls, or as having transmitted fraudulent robocalls, a demand for an explanation and verification of mitigation of the traffic is issued to the customer. If the fraudulent traffic is not remediated, 1 Point Communications LLC immediately begins rejecting all traffic from the offending customer.

Telephone Numbers

A Telephone Number (“TN”) based caller identity is the originating phone number included in call signaling used to identify the caller for screening purposes that is uniquely associated with the subscriber. A subscriber is permitted to use a TN as a caller identity if a TN is directly managed by 1 Point Communications LLC and/or obtained by 1 Point Communications LLC from 1 Point Communications LLC’s underlying carrier for use by the subscriber. Numbers can also be allocated by 1 Point Communications LLC or ported using information from previous bill matching customer information.

International Calling

1 Point Communications LLC is not currently an international voice services provider. If at any time 1 Point Communications LLC does decide to sell our services to international customers using North American Numbering Plan resources, we will familiarize ourselves with and develop best practices for full vetting of such customers and work with our underlying provider to perform the necessary telephone number validation on all international originated calls.

Call Analytics

1 Point Communications LLC relies on our underlying provider and/or their third-party vendors to determine if originating calls should be blocked based on call analytics practices.

Ongoing Robocall Mitigation

Security provisions are implemented to avoid fraudulent calls and minimize the risk of the robocallers. These provisions include, but are not limited to: IP based authentication, outbound rate limitations, destination restrictions, and CNAM services to detect fraudulent calls.

1 Point Communications LLC Contact for Robocall Mitigation-Related Issues

The Company will update our Robocall Mitigation filings within 10 business days of any change to the information outlined in this plan. Please direct any questions related to Robocall Mitigation issues to:

Jamous Bitrick
2200 Pratt Dr., Suite 2250
Blacksburg, VA 24060
540-627-6500
support@1pointcom.com