



Robocall Mitigation Program for FaxLogic, LLC (“FaxLogic”)

FaxLogic traffic is authenticated by FaxLogic, using unique customer identification, via the STIR/SHAKEN implementation by FaxLogic.

FaxLogic certifies that it commits to respond 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. FaxLogic also certifies that the attached searchable PDF details the specific reasonable steps it has taken to avoid originating illegal robocall traffic as part of its robocall mitigation program.

The FaxLogic Robocall Mitigation Program is outlined below.

FaxLogic has taken the following steps to detect originating robocall traffic:

1. FaxLogic investigates suspected illegal robocalls by examining subscriber call patterns in call logs and usage reports, to determine if calls are illegal.
2. FaxLogic monitors active call queues for suspicious traffic (e.g., high volume calls, repetitive calls, etc.).

FaxLogic has taken the following steps to prevent illegal origination of robocall traffic:

1. FaxLogic has procedures in place to confirm the identity of new commercial fax customers by collecting subscriber information, including company names, physical business locations, contact persons, email addresses, and phone numbers. FaxLogic also collects billing information, including state and country of incorporation, credit/trade references, and payment methods.
2. The FaxLogic Acceptable Use Policy (AUP), incorporated in its Terms of Service and published on its website, prohibits illegal and disruptive use of the service. FaxLogic may take corrective action, up to and including suspension or termination of service, for violation of the AUP.
3. FaxLogic provides fax numbers or subscribers port fax numbers for their exclusive use.
4. FaxLogic will maintain participation in the FCC Robocall Mitigation Database (RMD) and will adhere to its guidelines and best practices.

FaxLogic investigates suspicious activity:

1. FaxLogic examines call logs and usage reports for suspicious or illegal activity. Upon a thorough investigation, FaxLogic takes appropriate measures, as needed, to block illegal traffic.
2. FaxLogic regularly monitors and analyzes its call traffic. If analysis indicates the presence of possible illegal robocalling, management follows defined procedures, to investigate the subscriber generating the suspicious traffic.

Procedures include but are not limited to:

- Checking recent and past call detail records and benchmarking them against expected usage
- Checking recent and past account activity and purchases
- Investigating if any system issue generated the abnormal traffic patterns
- Verifying that the call originating path is valid
- Contacting the customer to understand his/her particular use case and validating that the activity belongs to that customer

FaxLogic blocks illegal robocalls:

1. FaxLogic can block inbound calls from and outbound calls to specific numbers.
2. FaxLogic implements Do Not Originate requests it receives from the Industry Traceback Group.

FaxLogic updates its program:

This program and industry best practices evolve, to respond to the dynamic nature of mitigating illegal robocalling. FaxLogic monitors industry best practices and continuously improves its internal processes, to ensure that this program and its systems adapt to ever-changing issues.

In the event of material changes to this program, FaxLogic will republish this program to its employees, consultants, and contractors and file an update to the FCC Robocall Mitigation Database.

All questions, inquiries, and notices regarding this program should be directed to Michael Dagate via:

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Phone: 972-664-3800
Fax: 972-664-3801
Postal Mail: 5050 Quorum Drive, Suite 700
Dallas, Texas 75254

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Dagate", with a stylized, flowing script.

Michael Dagate
CEO, FaxLogic