

Robocall Mitigation Plan

Loud & Clear Telecommunication, LLC is an interconnected VoIP service provider service the B2B marketplace. We have fully implemented a plan to eliminate robocalls across our network and are compliant with STIR/SHAKEN regulations and standards.

New Customer Screening

Every client is thoroughly vetted before their service commences. Loud & Clear works with each customer to understand their business and their specific business needs, first as part of the sales process and second as part of the implementation process. Loud & Clear will not provide service to any perspective customer whose intent is to use our service for an outbound call center as A) this is not our business model, B) it is unprofitable for us, and C) high volume/short duration traffic such as that created by an outbound call center or robocalling operation is explicitly prohibited by our contract with our upstream provider (Sinch).

Terms and Conditions

The Loud & Clear Master Service Agreement explicitly forbids the use of our service for outbound call center or robocall purposes. The use of our services for such actions will result in the immediate termination of services.

Services Offered

The services provided by Loud & Clear are limited to hosted PBX services on Cisco's Webex platform. In practical terms, this means that calls can only be placed through our system by manually dialing a phone as the only endpoints we support are IP phones. Additionally it means that only we control the outbound caller ID presented to the far end. This guarantee that when an outbound call leaves our system, the caller ID is a phone number that belongs to the client making the call.

Call Capacity Restrictions

The Loud & Clear system limits the number of concurrent calls that can be placed by any single user or client. The use of a low limit effectively eliminates the possibility of using our system for robocalls since the call volume is so minimal.

Security

As previously mentioned, Loud & Clear only supports IP phones. All calls from these devices to our system are authenticated. Furthermore, provisioning of the phones, i.e. providing them with the credentials necessary to place calls, is handled by Loud & Clear and conducted in a secure manner. This eliminates the potential for a rouge client to use their authentication credentials to connect something other than a phone to our system.

Caller ID

All calls originating from the Loud & Clear system present the caller ID of a phone number owned by the client placing the call. As previously mentioned, the ability to set or change the caller ID is controlled by Loud & Clear and we will only set the outbound caller ID to a phone number which is owned by the client.

Monitoring and Call Analytics

In the event that a client is able to evade the above attempts to prevent robocalls or if fraud occurs, Loud & Clear performs both real-time monitoring and CDR analysis of call volumes to quickly identify and terminate instances of high volume outbound calls. For real-time monitoring we utilize Cisco's Call Pattern Monitor. At an individual user level, this system automates the identification of callers who are generating high volumes of outbound calls and notifies our support team of the incident. When a



notification is received, our support team immediately disables the user's ability to place outbound calls and then investigates the underlying cause.

CDR analysis is performed monthly to identify clients and individual users whose call volumes exceed normal business usage. The CDR's are stored in a data warehouse and analysis is performed using a BI (business intelligence) tool.

In addition, our outbound traffic is carried by Sinch, as a Tier I carrier processing billions of call minutes, Sinch has sophisticated systems to monitor traffic on their network to identify instances of robocalling or fraud.

The above safeguards have proven exceptionally effective for Loud & Clear. In over 15 years of business, Loud & Clear has never had a customer who has engaged in either outbound call center activity or robocalling.

Know Your Upstream Provider

Loud & Clear utilizes Sinch for all of its inbound traffic. As a Tier I carrier, Sinch has extensive fraud and robocall mitigation tools at its disposal. However, in the event

Traceback and Enforcement Cooperations

Loud & Clear will cooperate fully and respond to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate or terminate calls. Loud & Clear has designated appropriate resources to ensure all matters are dealt with promptly within the 24 hr time period required by regulations.