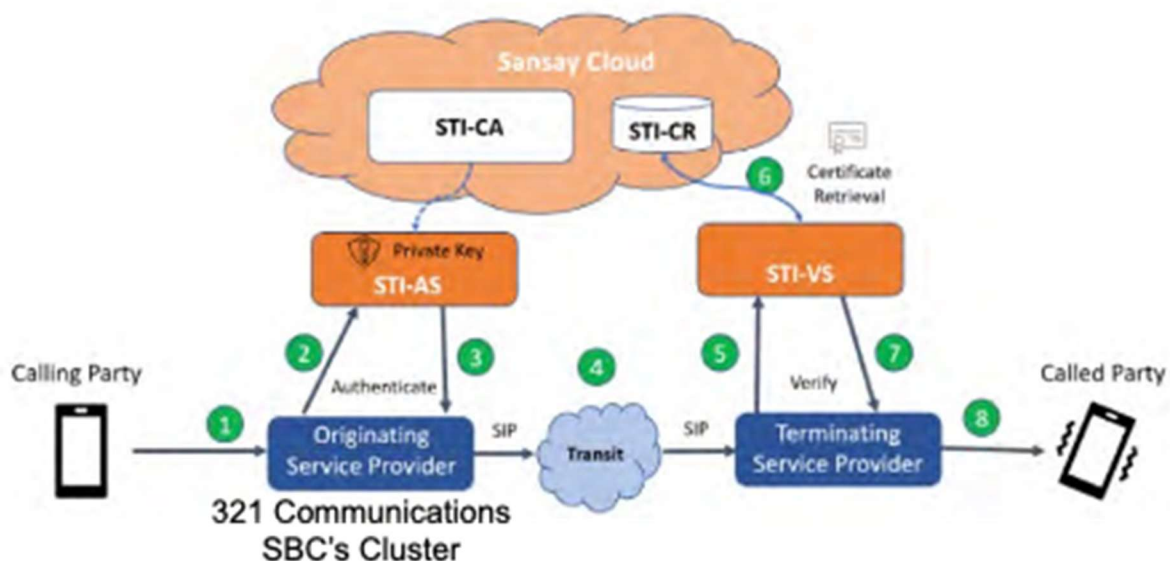


321 Communications Inc. Robocall Full/Complete Mitigation Program Description

Our company has deployed a complete robocall mitigation program that leverages our Session Border Controllers (SBCs) integrated with a Sansay service platform. For **outbound calls**, our SBCs interface with Sansay, which provides STIR/SHAKEN call authentication services to ensure that calls originating from our network are signed with the appropriate attestation level. For **inbound calls**, Sansay functions as a verification service, validating STIR/SHAKEN signatures on received calls before routing them to subscribers.

In addition, we maintain call analytics and monitoring mechanisms to detect and block abnormal calling patterns that may indicate robocall activity. Our operational policies prohibit customers from originating unlawful robocalls, and we take immediate action to suspend or terminate traffic associated with any violations.

This implementation ensures that we comply with FCC robocall mitigation requirements by authenticating outbound calls, verifying inbound traffic, and maintaining safeguards to prevent unlawful robocalls from originating or passing through our network.



- Authentication Service (STI-AS) which provides the originating service provider's SBC with call authentication - the STIR/SHAKEN signature.
- Verification Service (STI-VS) provides the terminating service provider with call verification to verify the legitimacy of the signature.
- Repository (STI-CR) - provides originating service providers with certificate hosting that terminating service providers use for call verification.
- Certificate Authority (STI-CA) - provides the originating service providers with STIR/SHAKEN certificates to sign calls.

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