



Robocall Mitigation Plan

We are a reseller of Single Point Global Inc. (RMD0006677) Hosted VoIP and do not have the capability to implement STIR/SHAKEN. Our partner provider has implemented STIR/SHAKEN protocols in their IP Voice networks.

We have not been prohibited from filing a certification in the Robocall Mitigation Database.

ITED Networks Inc. (dba KinteraComm), nor any of our executives or principals have a history of enforcement actions for illegal robocalls, TCPA or TSR violations or related state law violations.

We use the affirmative and effective measures detailed below to prevent the origination or transit of illegal robocalls.

Know Your Customer

We follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

Traceback

We respond within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls.

Robocall Mitigation Program

We rely on software provided by Single Point Global Inc. to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls through their Transnexus mitigation software.

ITED Networks takes the following actions to prevent robocalls from originating on our network.

- Business Verification
- Owner Name, Address, and Phone Number, Email
- Business Physical Address
- EIN
- Industry
- Description of product/services provided
- Call Per Second (CPS) Limits
- Number Source List - Allows customers to call out from their verified and owned numbers only.
- Call Detail Records (CDRs)
- The ITED Network service agreement strictly prohibits caller ID spoofing, any customer attempting to engage in caller ID spoofing is suspended and investigated.

Call Abuse Policy

In addition, we have implemented a Call Abuse Policy and have published the following policy to our web site, terms of use, and have notified our customers of the policy as copied below:

“Any call originated on the ITED Networks, Inc. DBA KinteraComm, network is subject to inspection and investigation if the call is suspected of being fraudulent, abusive, or illegal. Calls meeting any of these criteria will be blocked. If these conditions are repeated, becoming excessive, the subscriber may be disconnected from ITED Networks, Inc. DBA KinteraComm network, may be subject to further investigation by the FCC for enforcement of the TRACED Act and the subscriber may be subject to fines and penalties imposed by the FCC or the jurisdictional court”