



IntegriTel, Inc Robocall Mitigation Plan

IntegriTel, Inc has been communicating with customers to encourage feedback and reviews since 2016. A large part of our communications are through email, SSM/MMS, or Voice communications.

The primary provider for the SMS/MMS and voice for IntegriTel, Inc is via Bandwidth, Inc. RMD0002564 / FRN 0015443773. Since IntegriTel, Inc. routes through Bandwidth, the Bandwidth robocall mitigation plan applies as follows:

1. **Prevention:** Bandwidth has a stringent on-boarding screening process designed to proactively identify and prevent those that may engage in illegal robocalling from becoming Bandwidth customers at the outset. On-boarding screening procedures will always take Bandwidth's specific service provider role into account but the fundamentals of its on-boarding review procedures apply to all of Bandwidth's Intermediate, International Gateway and VSP services alike and we consider them to be the core of our "Know Your Customer" practices, which also inherently include "Know Your Upstream Provider" now in the context of the Commission's updated rules and terminology in wholesale service model scenarios (collectively "KYC"). Bandwidth tracks and records government enforcement actions and ever evolving industry trends to have up-to-date information on problematic use cases and known bad actors. Accordingly, Bandwidth requires that all of its upstream service providers (who may themselves be "Intermediate Providers", "Gateway Providers", "Originating Voice Service Providers" or "Foreign Service Providers") customers maintain valid registrations in the FCC's Robocall Mitigation Database ("RMD") and requires clear service-specific contractual requirements in which customers agree to cooperate with the ITG and agree to follow all applicable laws against illegal robocalling, fraud and abuse. After our initial "KYC" on-boarding screening, Bandwidth's operations personnel stay closely aligned with its customers and the industry's anti-robocalling efforts and developments to remind, educate and clarify what behaviors may signal or constitute unlawful robocalling, and continually notify customers when we identify instances that need their attention in order to prevent illegal robocalling behaviors on their networks.
2. **Monitoring and Detection:** Bandwidth has a team of operational experts who have implemented technical and operational processes and procedures to monitor, detect and analyze the use of its services and traffic on our network that helps to determine when illegal and inappropriate robocalling activity may be occurring. Bandwidth has developed and deployed a "Call Blocking Tool" that incorporates industry best practices into its core network to identify and block invalid, unallocated and otherwise obviously illegal telephone numbers. Further, even though it acts predominantly as an "Intermediate Provider", Bandwidth implemented STIR/SHAKEN in its all-IP core network infrastructure long before it was mandated by the FCC and has been working to increase call detail transparency and collaborative traceback enablement for years. When unlawful robocall campaigns are detected, Bandwidth follows established processes and procedures to notify upstream customers of the problematic traffic and request that they take immediate corrective actions to prevent reoccurrence of the illegal calls. Bandwidth's engagement and support for the ITG

Tracebacks also includes work to monitor that its upstream providers are effectively cooperating with the ITG and working to address the sources of each traceback event. Bandwidth consistently analyzes its call detail records to identify problematic call patterns and their sources from where it sits in a myriad of traffic flows. Bandwidth then incorporates these learnings into its traffic data analytics and detection technologies to continually improve its capabilities to accurately detect suspected illegal activity and deploy mitigation measures.

3. Mitigation: Bandwidth's operations personnel are positioned to rapidly assist the ITG with the industry's collective efforts to identify the originating sources of illegal activities on the PSTN and prevent further delivery of unwanted and illegal traffic to the greatest degree possible. Bandwidth tracks its ITG request data and conducts considerable outreach to upstream customers that have sent traceback traffic to Bandwidth. Bandwidth's upstream provider mitigation efforts aim to achieve demonstrable improvements in call quality, while also accounting for call quantities that are being serviced as well. When necessary and appropriate, Bandwidth can formally demand customers be put on a performance improvement plan, or if past mitigation efforts have failed, Bandwidth does take corrective action to terminate service arrangements that place Bandwidth and downstream providers and consumers at risk. Bandwidth's commitment to the benefits of STIR/SHAKEN in an all-IP network environment advances improvements in accurate and targeted call blocking that are designed to block calls from invalid and illegal telephone numbers in keeping with industry best practices and the FCC's recommendations, while simultaneously work to prevent anti-competitive and discriminatory blocking and mislabeling that is unfortunately plaguing the competitive industry with overly broad and blunt analytics. Bandwidth also works closely with Law Enforcement Agencies (LEA) at all levels of government and with its interconnected carrier partners. Bandwidth's fraud and security experts are constantly working to respond to complaints and trouble tickets with customers that may be associated with the unlawful uses of Bandwidth's services. In addition to these notifications, we then aim to work diligently together with our customers and other industry members to stop the unlawful robocall campaigns being detected. Finally, together with its active involvement in the ITG, Bandwidth supports the industry's established Do Not Originate (DNO) efforts pursuant to the industry best practices and procedures.

IntegrITel, Inc. certifies that it is committed to responding 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 robocall related traffic that use its service to originate calls, and that some of the voice traffic that originates on its network may not be authenticated with STIR/SHAKEN, and that all of the voice traffic that originates on its network is subject to a robocall mitigation program. IntegrITel, Inc. also certifies that the above document specifies reasonable steps it has taken to avoid originating illegal robocall traffic as part of its robocall mitigation program, and, if applicable, the type of extension or extensions it received under 47 CFR § 64.6304.

IntegrITel, Inc. further certifies that any clients that violates the robocall policy will be addressed and if required disabled within our platform(s). If or when IntegrITel, Inc., expands beyond Bandwidth, then this document will be updated accordingly.