

Robocall Mitigation Plan

12/18/2024

*Pursuant to the requirements of 47 C.F.R. § 64.6305, PocketiNet Communications, Inc. (the "**Company**") now submits this certification. Voip Innovations, LLC and Voip.ms ("the Service Provider")*

PocketiNet Communications, Commits to utilizing service providers that originate voice services with fully implemented Stir/Shaken policies and are registered with the FCC Mitigation Database. Company vets its upstream providers and reviews the Robocall Mitigation Database to determine if they are listed.

Company does not provide any dial tone to customers. Company only resells origination and termination voice services a verified service provider.

1. Company commits to respond within 24 hours to all traceback requests from the FCC, law enforcement, and the industry traceback consortium. Company further commits to cooperate with such entities in investigating and stopping any illegal robocallers from using its services to originate calls.
2. At no time in the prior two years has Company (or any entity for which Company shares common ownership, management, directors, or control) been subject of a formal FCC, law enforcement, or regulatory agency action or investigation due to (i) transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls; or (ii) a deficient Robocall Mitigation Database certification or mitigation program and description.
3. Company requires that all users and resellers of its voice services comply with applicable laws prohibiting illegal robocalling. Further, such contracts allow for blocking and/or termination of services for those that breach such provisions.
4. Company uses an on boarding process and verification requirements to confirm a customer's details when turning on its purchased services. Verification requirements include, but are not limited to, verification of information over the phone, validation of account ownership (e.g., proof of business ownership; billing address validation). Capabilities of services are not activated for new accounts until the customer completes a verification process.
5. Company internally limits international calling to Canada and Mexico except on case by case basis – Company will provide access to limited countries to individual customers on a limited basis and after verification.

Internal PBX Instance

1. Limited access to PBX – We have limited access to the Admin in the PBX's by limiting the number of users with administrative privileges
2. We are the ISP and first hand able to address any observed out-of-compliance traffic.
3. We have registered with each of our VoIP service providers as a part of the Stir/Shaken implementation insuring that they are performing robocall mitigation on origination calls.
4. Customer Due Diligence
 - a. New and Renewing Customers:
 - i. Verification of Customer information and persons that access to the customer account on a regular basis.
 - ii. Phone numbers, accounts numbers and phone statements are received and verified upon porting numbers to one of our service providers.
 - iii. We do not offer any services that enable large volumes of outbound calls.
 - iv. To determine the customer's identity and their right to use the telephone number for STIR/ SHAKEN purposes we use the latest phone statement from the previous phone carrier. If the information cannot be verified, we will not order services.

5. We do have a policy that defines the circumstances by which you deny, suspend or terminate service to a customer.
- a. Measures to Prevent or Avoid the Origination of Illegal Robocalls .
 - b. We have an acceptable use policies with enforceable terms of use.
 - c. We use analytics technologies or services to monitor traffic on our networks and identify potentially unlawful call origination activity?
 - d. What anti-fraud policies do you have?
 - i. If we have reason to believe that you or your Customers have used the Service for an unlawful purpose, we may forward the relevant communication and other information, including your identity or that of your Customers and End Users, to the appropriate authorities for investigation and prosecution. Appropriate authorities include, without limitation, law enforcement agencies, the Federal Communications Commission ("FCC") or the single industry Traceback Consortium designated by the FCC to trace suspicious calls back to the point of origin. You hereby consent to the forwarding of any such communications and information to these authorities, including, as necessary to comply with a lawful request, Confidential Information. In addition, we will provide information in response to law enforcement requests, subpoenas, and court orders, to protect our rights and property, and in the case where failure to disclose the information may lead to imminent harm to any customer or others.
 - ii. Are there any calls that you block by default, such as calls originating from invalid numbers? Yes. 900 numbers
 - iii. What penalties do you have in place if a customer violates the Robocall Mitigation Process implemented.
 1. Notwithstanding anything to the contrary in this Agreement, we may act immediately and without notice to suspend or limit the Services if we reasonably suspect fraudulent or illegal activity in your account, material breach of the Use Policies, or use of the Services that could interfere with the functioning of the CoreDial Network provided such suspension or limitation may only be to the extent reasonably necessary to protect against the applicable condition, activity, or use. We will promptly remove the suspension or limitation as soon as the condition, activity or use is resolved and mitigated in full. If you anticipate legitimate but unusual activity on its account, you should contact us in advance to avoid any Service disruption

Please contact my office if you have any questions about this plan.

Terri McMakin

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