

DESCRIPTION OF ROBOCALL MITIGATION PROGRAM

As part of Triton Global submission to the Robocall Mitigation Database, this document describes (1) the specific reasonable steps Triton Global has taken to avoid originating illegal robocall traffic as part of its robocall mitigation program, (2) its participation as a member of a working group, industry standards group, or consortium that is working to develop a non-internet Protocol caller identification authentication solution, and (3) its commitment to respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the in-dustry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

1 As described more fully in Section I below, for the purposes of this submission, “Entities” refers to a number of related entities.

I. ENTITIES COVERED BY CERTIFICATION

The following entities are all subject to the robocall mitigation policies and procedures described in this document:

- Triton Global
- Gigadat
- Fastrack Networks

II. EFFORTS TO AVOID ORIGINATING ILLEGAL ROBOCALLS AS PART OF THE ROBOCALL MITIGATION PROGRAM

All entities traffic generated is terminated on our own network and usage. The entities do not generate originating traffic to end-users.

III. LEADERSHIP ON STIR/SHAKEN DEVELOPMENT AND IMPLEMENTATION

The entities are using the Stir/Shaken procedures from our given suppliers.

IV. COMMITMENT TO RESPONDING TO TRACEBACK REQUESTS

The entities are committed to responding fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to co-operating with such entities in investigating and stopping any illegal robocallers.