

EXHIBIT TO CERTIFICATION OF LEONES COMP, LLC. FOR ROBOCALL MITIGATION DATABASE

As part of Leones Comp's submission to the Robocall Mitigation Database, pursuant to the FCC's Sixth Caller ID Authentication Report and Order, and applicable predecessor orders, this document describes (1) the specific reasonable steps Leones Comp takes to avoid carrying or processing illegal robocall traffic; (2) Leones Comp's commitment to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium; and (3) Leones Comp's commitment to cooperate with such entities in investigating and stopping any illegal robocallers that use the provider's service to carry or process calls. Leones Comp, LLC. previously provided its Robocall Mitigation Policy in compliance with the TRACED Act based on temporary exemption requirements outlined in 47 CFR § 64.6301.

Leones Comp is now submitting this certification document for admission into the Robocall Mitigation Database on the basis of its status as a voice service provider, pursuant to WC Docket No. 17-97 which references 47 CFR §§ 64.6303(c), 64.6305(d), 64.6305(e), 64.6305(f) and 64.6305(g).

I. ENTITIES COVERED BY CERTIFICATION

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

- Leones Comp, LLC.

II. DESCRIPTION OF ROBOCALL MITIGATION PROGRAM

a. Efforts to Avoid Carrying or Processing Illegal Robocalls

Leones Comp has and is making meaningful investments to implement upgrades and offer new features to combat carrying or processing illegal robocalls on its system(s). All calls originated on, or that traverse, the network are subject to a robocall mitigation program with detailed practices reasonably expected to significantly reduce the origination, processing or carrying of illegal robocalls.

Leones Comp deploys multiple systems to detect potential robocall activity based on statistics such as average call duration, Answer Seize Ratio ("ASR") and call count carrier/consumer reports. Leones Comp also uses the following solutions on Leones Comp systems to help minimize the impact of illegal or unwanted robocalls on customers:

- **Know Your Customer:** Before onboarding any new customer, Leones Comp conducts comprehensive "know your customer" (KYC) vetting. This process involves multiple checks to assess the legitimacy and integrity of potential customers. Our team investigates the type of service being sought and conducts a thorough review of the prospective customer's website, ensuring it contains functional links and does not utilize fictitious names. Further steps include reaching out to the losing carrier or provider, and/or engaging with other industry contacts to inquire about any potential issues related to the prospective customer. Another critical aspect of our KYC process is verifying the geographical location of the customer. Leones Comp does not engage with any entities that initiate traffic from outside the United States. Additionally, we do not offer services that would allow for the high call volume generally found in illegal robocalls, specifically do not allow, or offer our customers to utilize any type of dialer-based features on any of ours or customer owned systems that utilize the

trunks from our upstream provider. Finally, we will check if the FCC or the FTC have flagged the prospective customer or associated individuals for involvement in robocalling or spoofing activities.

- **Know Your Upstream Provider:** Leones Comp relies exclusively on Inteliquent as its sole upstream provider. This partnership ensures a consistent and reliable source for our telecommunications needs. By maintaining a direct and thorough understanding of our upstream provider's operations and capabilities, Leones Comp enhances the integrity and stability of the services offered to our customers. Inteliquent has not only implemented complete STIR/SHAKEN on all their calls, but they also currently provide us with complete A/B Level Attestation and Signing.
- **Network Tools:** Inteliquent, as our sole upstream provider, uses various network tools to combat illegal robocalls, these are therefore part of our mitigation plan by proxy, a list of these tools follows:
 - **Randomizer:** Utilized for customer traffic which is sent to Inteliquent via a Least Cost Routing (“LCR”) engine. Based on calling party telephone number analytics, an announcement is played to the calling party that requires the calling party to enter two randomly generated digits to complete the call. If the correct digits are not entered, the call will not proceed (machine generated calls presumably are unable to enter the randomly generated digits).
 - **Automatic Number Identification (“ANI”) Management:** Utilized for customer traffic which is sent to Inteliquent via an LCR engine. ANI Management is used to identify and block originating telephone numbers from sending calls that are believed to be unlawful based on repeat attempts to reach the Inteliquent network.
 - **Proactive Blocking:** Applied to all traffic. Per rules adopted by the Commission, Inteliquent blocks calls from phone numbers on Do-Not-Originate (“DNO”) lists from US Telecom, SOMOS and Neustar. In certain circumstances, Inteliquent also blocks calls that originate from invalid, unallocated, or unused numbers. Leones Comp’s customers may also place certain of the inbound-only telephone numbers they use on the DNO list.
 - **No Treatment:** This treatment is applied to lawful robocalls so that they can complete. Call types eligible for this treatment include debt collections, political calls, surveys, non-profit, emergency notifications, and other lawful call types.
 - **Whitelist:** Inteliquent “whitelists” telephone numbers that it knows originate legitimate calls (i.e., are valid). For example, some law enforcement and emergency calls originate from numbers where the entire telephone number is composed of zeroes. While appearing to be an unallocated number, Inteliquent knows based on call history that the call is originating from a federal law enforcement agency or a local police department. Such calls also originate from older or misconfigured PBXs (private branch exchanges). Another example would be collection calls by Bank of America or calls to known numbers used for emergency county-wide or municipal alerts.
- **Contract Termination:** Leones Comp typically has contractual rights that allow it to terminate customers that violate relevant law, including violations of the Telephone Consumer Protection Act. When appropriate, Leones Comp enforces these rights. Subject to applicable laws that may prevent it from doing so, Leones Comp may also terminate accounts if it discovers that any of the entities or individuals associated with a customer account have been named by the FCC or the FTC as an illegal robocaller or have failed to respond to traceback requests.

As a voice provider, Leones Comp has a direct relationship with its customers originating calls on our systems. Accordingly, if Leones Comp suspects it has identified unlawful calling, in addition to taking the steps identified above, our team works to investigate the system(s) generating the calls (i.e., Leones Comp's PBX systems), to identify the party sending originating the calls, determine whether the calls are unlawful, and then to eliminate the source of the calling. At the same time, Leones Comp is aware of the need to balance any blocking and termination efforts with the goal of preventing the blocking of legitimate calls, particularly those that have a bearing on public safety or health (e.g., a school system sending an alert or law enforcement).

b. Traceback Requests

Leones Comp commits to continue to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium.

c. Commitment to Cooperate in Investigating and Stopping Illegal Robocallers

Leones Comp also agrees to promptly respond to inquiries from law enforcement and regulators, including the FCC, Federal Trade Commission ("FTC") or state attorneys general seeking traceback or similar information. Leones Comp commits to continue to cooperate with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that use Leones Comp's services to carry or process calls.

d. STIR/SHAKEN Compliance

Currently Leones Comp lacks the access to the network of our upstream provider, Inteliquent, to implement STIR/SHAKEN compliance. But as outlined above, this is currently being offered and implemented by Inteliquent on our behalf. Additionally, Leones Comp will investigate, research and work with a STIR/SHAKEN provider (i.e., TransNexus, Neustar, Sansay, etc.) to implement STIR/SHAKEN on our systems.

e. Operating Company Numbers

- i. Leones Comp, LLC.: No