

PREFERRED TEL INC – Robocall Mitigation Plan

PREFERRED TEL INC (the “Company”) is committed to preventing illegal robocalls and protecting the integrity of the telecommunications network. The Company cooperates with the **Federal Communications Commission (FCC)**, law enforcement authorities, and the **U.S. Telecom Industry Traceback Group** to investigate and mitigate suspected illegal robocall activity associated with traffic on its network.

The Company operates as a **reseller of voice services**, transmitting and terminating traffic through upstream carrier partners. The Company **supports implementation of STIR/SHAKEN caller ID authentication through upstream carriers**, where technically feasible, on calls that are originated via those partners.

The Company commits to responding promptly—typically within 24 hours—to traceback requests from the Industry Traceback Group, the FCC, and law enforcement agencies. Upon notification of suspected illegal robocall activity, the Company will investigate and take appropriate mitigation actions in coordination with its upstream carriers, which may include blocking traffic, suspending services, or terminating customer accounts when warranted. If the Company concludes that traffic is not illegal, it will provide a written explanation to the notifying authority.

To detect potentially unlawful traffic, the Company uses internal systems and third-party tools to monitor customer activity, including:

- Identification of **Do Not Originate (DNO)** numbers, invalid or unassigned number blocks, and spoofed caller IDs
- Analysis of abnormal calling patterns, excessive call volumes, and deviations from customer profiles
- Call-per-second and concurrent session limits to prevent abuse

The Company maintains a **Know Your Customer (KYC)** program before **servicing new customers**. Verification may include electronic and manual identity checks, credit evaluation, industry references, review of intended service use, and confirmation that the customer is **either a business with whom the Company has an existing personal or business relationship, or referred by a company with which the Company has such a relationship**. New accounts may have service restrictions until verification is complete.

The Company reserves the right to refuse, block, or terminate traffic or customer accounts when illegal robocalling, unauthorized number use, or caller ID spoofing is identified or reasonably suspected.

Upstream Carrier Cooperation: The Company works closely with upstream carriers to ensure that exchanged traffic is monitored and mitigated for illegal robocall activity in accordance with industry best practices.

Through these measures, PREFERRED TEL INC demonstrates ongoing commitment to robocall mitigation, supports industry-wide efforts, and ensures adherence to FCC rules and regulations.