



6635 W. Happy Valley Road
Suite A104-457
Glendale, AZ 85310

602-368-6400

Robocall Mitigation Plan for Initiatel LLC

Initiatel commits to respond to all trace back requests from the FCC, law enforcement, the USTelecom Industry Traceback Group (ITG) and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls. Initiatel will designate a single point of contact to address tracebacks to expedite the process.

Initiatel has taken the following steps to detect originating robocall traffic:

A. Initiatel does not permit customers to set their own caller ID information. All traffic is fully managed on our servers. Customers are unable to set fraudulent CLID.

B. Initiatel takes steps to confirm the identity of every customer by directly communicating with each new customer via both voice and email. Phone numbers and addresses are verified using online resources. Initiatel does not allow customers to subscribe online or without manual vetting. Initiatel requires customers to provide:

1. Physical business location
2. Contact person(s)
3. General nature of the customers business
4. Types and volume of calls to be placed

C. Every customer is required to read and agree to Initiatel's Acceptable Use Policies (AUP) and Terms of Service, which reflects our prohibition on all types of fraudulent calls including robocalls. Our terms prohibit the use of any fraudulent or invalid caller ID, or using the service for any unlawful or fraudulent purpose. Initiatel's service agreements include the provision to immediately terminate service for any legal violation.

All inquiries, complaints, or notices should be sent to:

Carlos Alvarez
carlos@initiatel.com
602-368-6403

Or to the mailing address above.