
SYSTEMSEVEN Robocall Mitigation Policy

Overview

SYSTEMSEVEN Services, LLC (SYSTEMSEVEN) recognizes the continuing efforts of the FCC and telecommunications partners to dampen and eliminate Robocalling over public switched telephone networks. This document includes SYSTEMSEVEN's policies and procedures to help ensure Robocalling does not occur or remain within our network. This document shall be submitted to the FCC in its ongoing efforts to combat Robocalling and demonstrate our commitment to tracebacks and cooperate with any investigation connected to any SYSTEMSEVEN customer device.

General Provisions Against Robocalling

SYSTEMSEVEN prohibits any abuse in our network, which includes Robocalling. Shall a user be found to breach our Terms of Service, services will be immediately terminated and restored on a case-by-case basis if the abuse is resolved. SYSTEMSEVEN is currently in the process of updating its Terms of Service and will be including a provision explicitly outlining the unacceptable nature of Robocalling and/or providing false, altered, or otherwise misleading information for CallerID.

Knowing Our Customer

SYSTEMSEVEN builds personal relationships with our customers. We begin with a vetting process to understand their business and what services we can offer them, ensuring we are a good fit. This is a direct contact relationship and executed with termed contracts for services. SYSTEMSEVEN does not engage with customers we deem unfit for our services or believe could endanger our network, services, or business. SYSTEMSEVEN does not take on services where auto-dialers, broadcast technologies (Faxing, Calling, SMS, or MMS) are required.

When provisioning an account, SYSTEMSEVEN sets the outbound CallerID name & number congruent with the work order and a valid number that the customer has with SYSTEMSEVEN. We do not allow the customer to set CallerID name or number on their own, via portal nor API. Changing this information requires a SYSTEMSEVEN technician to perform.

In most cases, SYSTEMSEVEN owns or controls the equipment on-site, which allows us to configure or ensure the configuration of said equipment. Ownership of the equipment helps us meet proper specifications and follow the rules of our network and services. User access to this equipment is prohibited, ensuring only authorized SYSTEMSEVEN employees and/or contractors can manage and change the equipment and/or its configuration. Furthermore, appropriately authorized access ensures

that addresses in our systems are valid. SYSTEMSEVEN will only provision service to sites we manage (except for roaming offices/users who may have individual services relating to an established customer).

Traceback Request

SYSTEMSEVEN responds to all law enforcement and government requests promptly, which includes FCC Traceback requests. SYSTEMSEVEN will cooperate fully with authorized requests and investigations and is committed to prohibiting Robocalling on our network or facilities.

STIR/SHAKEN Extension

SYSTEMSEVEN has fewer than 100,000 voice subscriber lines making us eligible for and allowing us to claim the extension of implementation of STIR/SHAKEN (47 CFR § 64.6304). However, all voice traffic originating from our network or subscribers will be subject to Robocall mitigation.

Robocall Mitigation Program

SYSTEMSEVEN takes steps to mitigate and prevent Robocalls on our network with the following factors:

- 1) We do not allow end-users to set Outbound CallerID (Name or Number)
- 2) We limit the number of permitted call paths to what the customer subscribes to
- 3) We audit call volumes and Call Detail Records (CDR) to ensure compliance and prevent abuse
- 4) If calls are identified in an audit (spot or automated), these calls are reviewed in an expeditious manner

If we determine calls are abusive (including Robocalling), the end user will be immediately subject to partial or full termination of services until a time where the abusive issue is resolved and eliminated. Shall abuse continue thereafter, the customer will be subject to a full disconnect of services.