



Robocall Mitigation Program

Traceback and Enforcement Cooperation:

CommSuite LLC, dba TALKVOX will cooperate in traceback investigations. TALKVOX will dedicate sufficient resources to provide prompt and complete responses to traceback requests from law enforcement and from US Telecom's Industry Traceback Group. TALKVOX has identified a single point of contact in charge of responding to these traceback requests and will respond to traceback requests as soon as possible within 24 hours, excluding weekends and major holidays. TALKVOX will require traceback cooperation. For all new and renegotiated service applications governing the transport of voice calls, our policy will specify the use of best efforts to require cooperation traceback investigations by identifying the upstream provider from which the suspected illegal robocall entered its network or by identifying our own customer if the call originated in our network.

Subscriber Vetting Practices:

1. Residential and Small Business:

TALKVOX will vet residential and small businesses through regular business practices and obtain billing address, primary residence, or business location.

2. Commercial Retail End-Users:

TALKVOX will confirm the identity of commercial customers by collecting information such as physical business location, contact person(s), state or country of incorporation, federal tax ID, and the nature of the customer's business.

Ongoing Robocall Mitigation Practices:

TALKVOX has call detail records to determine typical call volume and potential reasons for significant deviations from the usual call volume. TALKVOX will investigate suspicious calls and calling patterns. If TALKVOX detects a pattern consistent with illegal robocalls, or if TALKVOX otherwise has reason to suspect illegal robocalling or spoofing is taking place over our network, TALKVOX will seek to identify the party that is using our network to originate, route or terminate these calls and take appropriate action. Taking appropriate action may include, but is not limited to, initiating a trace back investigation, verifying that the originating customer owns or is authorized to use the Caller ID number, determining whether the Caller ID name sent to a receiving party matches the customer's corporate name, trademark, or dba name, terminating the party's ability to originate, route or terminate calls on its network, and notifying law enforcement authorities.

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