

Robocall Mitigation Program

Company Overview

CopperNet Systems, Inc. provides voice services to customers and maintains strict measures to prevent illegal robocalls from originating on its network. We are fully committed to complying with the requirements of **47 CFR § 64.6305(a)**, including:

- Taking reasonable steps to avoid originating illegal robocall traffic.
- Cooperating fully with traceback requests from the FCC, law enforcement, and the industry traceback consortium.

▪ Call Origination Policy

- **Human Interaction Requirement:**
CopperNet Systems, Inc. prohibits calls originating from automated systems or auto-dialers. All calls must originate through **human interaction**.
- **Device and Customer Verification:**
All devices and platforms registered with CopperNet Systems are verified to ensure compliance with this policy.

▪ Firewall and IP Traffic Restrictions

- **Device and Customer Verification:**
All devices and platforms registered with CopperNet Systems are verified to ensure compliance with this policy
- **Firewall Enforcement:**
CopperNet Systems employs advanced firewalls to monitor and restrict call traffic. This includes:
 - Blocking traffic from **unverified or suspicious IP addresses**.
 - Allowing traffic **only from approved IP addresses** tied to registered customer devices.
 - Regular updates to IP allow/block lists to prevent unauthorized activity.
- **Traffic Monitoring:**
Continuous monitoring is in place to detect unusual call patterns and unauthorized traffic.

■ **Caller ID Monitoring**

CopperNet Systems monitors **caller ID information** to prevent spoofing and ensure the legitimacy of all calls:

- Caller ID numbers are registered and tracked for specific devices.
- Any anomalies, such as spoofed or unauthorized numbers, trigger immediate reviews.

■ **Accurate Call Records**

CopperNet Systems maintains detailed call records for all calls originating on its network. These records include:

- Originating device or system.
- Caller ID information.
- Destination number.
- Date and time of the call.
- IP address of the originating device.

Call records are retained for a **minimum of one year** and can be provided upon request to authorized entities for traceback investigations.

■ **Cooperation with Traceback Requests**

CopperNet Systems fully cooperates with the **FCC**, law enforcement agencies, and the **industry traceback consortium**. This includes:

- Responding to traceback requests **within 24 hours**.
- Providing call records and network data as required.
- Taking immediate corrective action to address illegal robocall traffic.

■ **Continuous Monitoring and Enforcement**

CopperNet Systems actively monitors its network for unauthorized or suspicious call activity. Our enforcement actions include:

- Immediate isolation and review of suspicious traffic.
- Blocking calls from unapproved devices or IP addresses.
- Notifying customers and, if necessary, terminating service for violations.

■ **Customer and Device Compliance**

All customers and devices must adhere to the following:

- **No autogenerated calls** are permitted.
- Devices must be verified and authorized before initiating calls.



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- Customers must use pre-approved IP addresses and caller ID numbers.
- Compliance with all laws governing voice services is required.

▪ **Commitment to Compliance**

CopperNet Systems, Inc. is committed to:

- Preventing illegal robocalls from originating on our network.
- Responding promptly to traceback requests.
- Continuously improving our mitigation processes to align with industry best practices and regulatory requirements.

Program Contact Information

CopperNet Systems, Inc.

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This **Robocall Mitigation Program** ensures compliance with FCC regulations and demonstrates CopperNet Systems, Inc.'s commitment to preventing illegal robocalls while protecting the integrity of the voice network.