



SONIC SYSTEMS INC. ROBOCALL MITIGATION PLAN

This Robocall Mitigation Plan is submitted by Sonic Systems Inc. pursuant to the provisions of 47 C.F.R. § 64.6305, adopted by the Federal Communications Commission (FCC) which require all "voice service providers" to establish a "robocall mitigation plan". This document sets forth Sonic Systems Inc.'s current policies and procedures designed to reduce or eliminate outbound illegal robocalls originating on its network. Sonic Systems Inc. views these policies and procedures as constituting "reasonable steps" to avoid the origination of illegal robocalls on its network and in addition to following these steps Sonic Systems Inc. commits to responding to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG), and to cooperate with such entities in investigating and stopping any illegal robocallers that may use its service to originate calls.

STIR/SHAKEN IMPLEMENTATION STATUS

As indicated in the FCC's Robocall Mitigation Database, Sonic Systems Inc.'s status with respect to STIR/SHAKEN implementation is as follows:

- Sonic Systems Inc. has partially implemented the STIR/SHAKEN authentication framework on the IP portions of its network
- All originated calls are subject to our robocall mitigation program
- We commit to responding to all traceback requests within 24 hours

TRACEBACK REQUESTS

Sonic Systems Inc. will cooperate with the FCC, law enforcement and the ITG on all traceback requests and investigations. To allow for timely and comprehensive law enforcement response efforts against illegal robocallers, Sonic Systems Inc. will dedicate sufficient resources to promptly complete and provide responses to all traceback requests from the FCC, law enforcement and/or the ITG, and commits to fully responding to any traceback request received after receiving the same.

CUSTOMER VETTING PRACTICES

To minimize the origination of illegal robocalls through its voice services, Sonic Systems Inc. implements the identity of all its voice service subscribers. The subscriber vetting process is intended to help determine the legitimacy of a customer for the purpose of establishing a service relationship. Sonic Systems Inc.:

- Utilizes service agreements and acceptable use policies as a means of preventing its new and existing subscribers from using their voice and broadband services in ways that would be in violation of local, state, or federal laws, or to engage in deceptive or fraudulent activity.
- Has established a routine process for monitoring the usage and quality of its network facilities and conducts recurring and timely reviews of its call detail records (CDRs) to facilitate early identification of unusual or suspicious calling activity or patterns that may indicate use of the network for originating illegal robocalls.



TELEPHONE NUMBER VALIDATION PRACTICES

Sonic Systems Inc. has procedures in place to confirm the calling customer's right to use a telephone number. Specifically, a subscriber of Sonic Systems Inc.'s services is permitted to use a telephone number as their caller identity if a number is directly managed by Sonic Systems Inc. and/or obtained by Sonic Systems Inc. via an underlying partner.

KNOW YOUR UPSTREAM PROVIDER PROCEDURES

Sonic Systems Inc. is committed to taking those steps necessary to ensure that any upstream providers providing connectivity are equally committed to monitoring their networks and preventing their use for the transmission of illegal robocalls. This includes the use of robocall prevention language in any contracts that Sonic Systems Inc. may directly have with any upstream provider entities.

ONGOING ROBOCALL MITIGATION PRACTICES

Sonic Systems Inc. monitors the usage of its network and examines call detail records (CDRs) on a recurring basis for the purpose of detecting suspicious call activity and/or calling patterns. When network usage patterns consistent with illegal robocalls are detected or Sonic Systems Inc. otherwise suspects illegal robocalling or spoofing is taking place on its network, it immediately seeks to identify the party that is originating, terminating, or routing these calls so that it may take appropriate action.

THIRD-PARTY ANALYTICS

Sonic Systems Inc. also uses third-party call analytics to further assist and prevent the origination of illegal robocalls on its network. This Robocall Mitigation Plan demonstrates Sonic Systems Inc.'s commitment to implementing effective measures to combat illegal robocalls and comply with FCC regulations.

TRACEBACK REQUEST POINT OF CONTACT

