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Robocall Mitigation Plan

IP Solutions Inc. is a small voice service provider focused on the small and medium business market in Puerto Rico. Most of our calls are made to and from Puerto Rico.

IP Solutions' robocall mitigation program includes specific reasonable steps to prevent and avoid originating illegal robocall traffic.

Customer Validation

We have a set of rules that subscribers accept before being permitted to use IP Solutions' services. These rules include prohibiting the provision of altered or false information, violating any applicable local, state, or federal law or using service in connection with fraudulent activities.

IP Solutions obtains subscriber specific information when a service is required or renewed. This includes collecting documents and information such as: Certificate of Incorporation, IRS document, physical and postal address, contact information such as names, email address, phone numbers. IP Solutions makes all efforts deemed necessary to verify the information and documents received.

The phone numbers are directly managed and/or obtained by IP Solutions from one of underlying carriers for use by the subscriber. IP Solutions tracks these numbers in its inventory system and monitors the assignment of these numbers. If a subscriber wishes to use a phone number and that phone number is not directly managed by IP Solutions, portability is requested. IP Solutions validates the subscribers' right to use the phone numbers as part of the portability process. Telephone calls originated by IP Solutions subscribers are associated only with telephone numbers assigned by or ported to IP Solutions.

Upstream Provider Validation

IP Solutions only exchanges voice traffic with a limited set of providers. IP solutions verify the provider's identity and whether the provider is certified by the government regulatory agencies.

Monitoring

IP Solutions analyses its traffic periodically to identify any potential risk of calls related to fraud or robocall systems. IP Solutions' support team notifies if they observe excessive call volumes or suspicious call patterns originating from a customer's line. Upon receiving this notification, we immediately proceed to stop the service to such a client while it is investigated whether the activity is related to illegal traffic of automated calls.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, the support team follows the defined procedures on investigating such subscribers. The procedures established include:

- Checking recent and past call detail records and benchmark against expected trends
- Checking account activity, renewed or services added
- Investigating if any system issue generates the variations
- Verifying that the call originating path is valid
- Contacting the subscriber to understand the case and validate that the activity belongs to that subscriber.

If the monitoring systems identify suspected robocalling patterns that are confirmed with further investigation, IP Solutions will take appropriate action which may include suspending or terminating the subscriber's use of IP Solutions services.

Commitment

IP Solutions will cooperate with investigative commits to respond fully, within 24 hours, to valid traceback requests made by the Federal Communications Commission, law enforcement authorities, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.