

Inline Communications Inc. - ROBOCALL MITIGATION PROGRAM

Below is the Robocall Mitigation Plan filing for Inline Communications Inc. This plan will be submitted to the FCC's Robocall Mitigation Database and will be adapted to adjust to the latest laws, regulations, and industry best practices.

Monitoring

Inline Communications Inc. has monitoring and reporting systems in place to analyze high-volume voice network traffic to identify and monitor patterns consistent with robocalls. Our monitoring systems provide alerts on calling patterns with unusual spikes, traffic patterns, or attempted use of non-validated Telephone Number (TN) to detect patterns consistent with illegal robocalls.

If Inline Communications Inc. detects a pattern consistent with illegal robocalls, or we have reason to suspect illegal robocalling or spoofing is taking place over our network, we will seek to identify the party that is using our network to originate, route, or terminate these calls. and take appropriate action.

Appropriate action may include:

- Validating that the originating party is authorized to use the TN.
- Suspending calling party's ability to originate, route, or terminate calls on Inline Communications Inc. network.

Traceback Cooperation

Inline Communications Inc. commits to responding in a timely manner and supporting all traceback requests from the FCC, law enforcement, and the [Industry Traceback Group \(ITG\)](#).

Inline Communications Inc. Robocall Mitigation Solution Overview

- General information
 - Each call is assessed through the Inline Communications Inc. model, leading to constantly refreshed view of call behavior and probability of a given number currently being used for robocalling.
 - Active numbers are assessed by the model for behavioral attributes typically associated with robocalling including:
 - Neighbor spoofing events
 - Sudden spikes in volume, such as driven by call spoofing
 - The service covers both US domestic and international TNs.
- Calls originating from our network (i.e., Robocall Protection)
 - Provides detailed reporting identifying suspected illegal robocalls and alerts if calls originate where the calling number is invalid, unallocated.
 - If the platform detects a suspected robocalling patterns Inline Communications Inc. will take appropriate action which may include suspending or terminating the subscriber.

- Supports a real time query to service to determine if a number originating on our network could be a robocall. Such calls can be blocked, or the terminating party can be notified.
- Termination (i.e., Robocall Mitigation)
 - Supports a real-time query to service to determine if a number terminating on our network could be a robocall.
 - Such calls can be blocked.