

TCE Communications, Inc.

Robocall Mitigation Plan

Introduction

This document details the reasonable steps and actions taken by TCE Communications, Inc. (“TCE”) to mitigate and eliminate illegal robocalling. TCE has an ongoing commitment to scan for and help alleviate illegal robocalling by pre-qualifying prospective customers, monitoring existing customers for traffic patterns indicative of prohibited robocalls, and working with other providers and regulatory agencies in combatting fraudulent voice activity.

TCE provides interconnected Voice over Internet Protocol (“VoIP”) calling services. All telecom services are provided on a resale-only basis. As a telecom reseller, TCE is dependent on our underlying provider’s assistance with monitoring their networks for fraudulent voice calling patterns.

Know Your Underlying Provider

Through TCE’s Terms and Conditions, we mandate that each agreement with our upstream providers incorporates strict policies pertaining to fraudulent calls. Our upstream providers agree to abide by the FCC’s STIR/SHAKEN and robocall mitigation rules in all respects when providing voice services. TCE and its underlying providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Know Your Customer

Screening interviews are performed to understand potential customer business models and the potential, or lack thereof, for involvement in fraudulent robocalling schemes. TCE requires the client to provide us with: Legal Business name, Type of Business (LLC, C-Corp, etc.), Legal Business Address, Official website.

In our research of the prospect, TCE will not activate clients that provide anonymous information or where data mismatches are found. Additionally, prospects are required to agree to TCE’s strict policies and contractual terms prohibiting the act of fraudulent voice activity as a condition of doing business with TCE.

Individuals associated with prospects or current customers who have been known to act improperly or otherwise be involved in fraudulent robocalling will cause their companies to be rejected by TCE as a customer and any existing customer relationships could potentially be severed.

Traceback Requests

TCE is committed and will respond fully within 24 hours to all Traceback Requests from the FCC, law enforcement agencies, and the industry traceback consortium and vows to cooperate with these agencies in investigating and stopping any illegal robocallers that use our service to make calls. TCE will devote sufficient resources to provide prompt and complete information to traceback requests. Our point of contact to handle all traceback requests is:

Sarah Goffman

CEO

(847) 558-7717

sgoffman@tcecompany.com

Upon request, we will provide call logs, which include the date and time of the call and the length. We can also provide a recording of the call if the client has call recording set up.

If a traceback exposes an existing customer as the source of fraudulent robocalls, or as having transmitted fraudulent robocalls, a demand for an explanation and verification of mitigation of the traffic is issued to the customer. If the fraudulent traffic is not remediated, TCE immediately begins rejecting all traffic from the offending customer.

Telephone Numbers

A Telephone Number ("TN") based caller identity is the originating phone number included in call signaling used to identify the caller for screening purposes that is uniquely associated with the subscriber. A subscriber is permitted to use a TN as a caller identity if a TN is directly managed by TCE and/or obtained by TCE from TCE's underlying carrier for use by the subscriber. Numbers can also be allocated by TCE or ported using information from previous bill matching customer information.

We also require a sign Letter of authorization that is provided to the losing carrier. We also submit the information in question 3 through Trust Hub with Twilio. This is the Stir/Shaken portal.

For subscribers with multi-line telephone systems, TCE and our underlying provider only allow calls to be connected if the originating number matches one of the TN's assigned to the subscriber. This screening capability enables an automated and secure method of validating originating telephone numbers.

International Calling

TCE does allow their subscribers to make international calls. The company who is purchasing services from us will provide us with a list of employees who are authorized to call internationally. The client also provides a list of countries each person is authorized to call.

TCE does not accept calls from Foreign Voice Service Providers or Foreign Intermediate Providers that use NANP resources that pertain to the U.S. in the caller ID field to send voice traffic to residential or business subscribers in the U.S.

Call Analytics

As a reseller, TCE must rely on our underlying provider and/or their third-party vendors to determine if originating calls should be blocked based on call analytics practices. In our efforts, TCE can block certain area codes from being called. These are known toll- fraud numbers/ area codes. We also have alerts on our call traffic of over 1,000 minutes per day on any account. Most of our subscribers do not use over 1,000 minutes per day.

Ongoing Robocall Mitigation

TCE monitors and examines call detail records (CDRs) on a repeating basis to detect suspicious call activity and/or calling patterns. When we and/or our underlying provider detect network usage patterns consistent with illegal robocalls or suspect illegal robocalling is taking place, we will immediately seek to identify the party that is originating, terminating, or routing these calls so that we may take appropriate action. The actions taken may include, but are not limited to initiating a traceback 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 and/or d/b/a name; block the party's ability to originate, terminate, or route calls on the network; and/or providing notice to law enforcement authorities.

TCE does offer an option to block and report specific phone numbers for inbound calling if the call is a robocall. We also do offer an option to our client to run every number through a database to determine the spam risk. If the spam risk is high, the call is blocked. If it is deemed that the traffic is illegal, the client's account is suspended. We do have terms in our terms and conditions that we are able to suspend or cancel services if the traffic is deemed illegal. The information will be turned over to the authorities.

As part of our Plan to mitigate and prevent any originating robocalls, we are committed to early identification and investigation of possible robocalling conditions. Among other things, we watch for higher-than-normal subscriber traffic volume, including large bursts of traffic in small

timeframes or spikes in usage. We also monitor for originating calls of short duration and low call completion percentages, originating calls with sequential called to number dialing patterns.

TCE Contact for Robocall Mitigation-Related Issues

TCE will update our Robocall Mitigation filings within 10 business days of any change to the information outlined in this plan. Please direct any questions related to Robocall Mitigation issues to:

Sarah Goffman, CEO

PO Box 132

Caledonia, IL 61011

(847) 558-7717

sgoffman@tcecompany.com