

SMART NETWORK SOLUTIONS COMM CORP.

Robocall Mitigation Plan

Introduction

This document details the reasonable steps and actions taken by SMART NETWORK SOLUTIONS COMM CORP. ("SMART NETWORK") to mitigate and eliminate illegal robocalling. SMART NETWORK 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.

SMART NETWORK is a managed service provider who also provides Interconnected Voice over Internet Protocol ("VoIP") calling services. All telecom services are provided on a resale-only basis. As a telecom reseller, SMART NETWORK is dependent on our underlying provider's assistance with monitoring their networks for fraudulent voice calling patterns.

Know Your Underlying Provider

SMART NETWORK SOLUTIONS COMM CORP. has master service agreements with our upstream providers and has received written assurances from their officials that it has and will continue to sign calls submitted to SMART NETWORK SOLUTIONS COMM CORP. and will abide by the FCC's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice services to SMART NETWORK. SMART NETWORK and its upstream 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.

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

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 SMART NETWORK as a customer and any existing customer relationships could potentially be severed.

Traceback Requests

SMART NETWORK 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.

SMART NETWORK will devote sufficient resources to provide prompt and complete information to traceback requests. Our point of contact to handle all traceback requests is:

Sandra Valencia
Director
Sandra@smartisvoip.com
305-269-4142 , ext 103

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, SMART NETWORK 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 SMART NETWORK and/or obtained by SMART NETWORK from SMART NETWORK’s underlying carrier for use by the subscriber. Numbers can also be allocated by SMART NETWORK or ported using information from previous bill matching customer information.

For subscribers with multi-line telephone systems, SMART NETWORK 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

SMART NETWORK is not currently an international voice services provider. If at any time SMART NETWORK does decide to sell our services to international customers using North American Numbering Plan resources, we will familiarize ourselves with and develop best practices for full vetting of such customers and work with our underlying provider to perform the necessary telephone number validation on all international originated calls.

Call Analytics

As a reseller, SMART NETWORK 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.

Ongoing Robocall Mitigation

When SMART NETWORK receives notifications from our carriers, we investigate the incident, and if confirmed, we shut down the traffic.

In the RMD, SMART NETWORK has chosen Option 2: Partial STIR/SHAKEN Implementation – Performing Robocall Mitigation. The filer certifies that it is a Non-Gateway Intermediate Provider Filing and for all US destined calls, it will partially implement STIR/Shaken implementation by contracting only with carriers that have implemented STIR/SHAKEN and agree to sign all US destined calls from filer with valid tokens provided by Certified Authorities. The filer certifies that it commits to respond to all traceback requests from the Commission, law enforcement, 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.

No voice traffic originates on filer's network. Resold intermediate voice traffic destined for the US will be identified and treated with STIR/SHAKEN authentication, so all of the resold voice traffic from filer that terminates to the US will be subject to a robocall mitigation program.

SMART NETWORK Contact for Robocall Mitigation-Related Issues

The Company 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:

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