

DESCRIPTION OF ROBOCALL MITIGATION PROGRAM

As part of Delta Carrier Group Inc submission to the Robocall Mitigation Database, this document describes (1) the specific reasonable steps Delta Carrier Group Inc has taken to avoid originating illegal robocall traffic as part of its robocall mitigation program and (2) its commitment to respond fully and in a timely manner to all trace-back requests from the Commission, law enforcement, the industry trace-back consortium, and to cooperate with such entities in investigating and stopping any illegal robocalls that use its service to originate calls.

I. ENTITIES COVERED BY CERTIFICATION

The following entities are all subject to the robocall mitigation policies and procedures described in this document:

- Delta Carrier Group Inc

As described more fully in Section I, for the purposes of this submission, “Delta Carrier Group Inc” refers to a number of related entities.

All of these entities are subject to the same robocall mitigation plan. For the purposes of this document, these entities are collectively referred to as “Delta Carrier Group Inc”

Delta Carrier Group Inc has made meaningful investments to implement network upgrades and offer new features to combat illegal robocalls as part of its robocall mitigation program. Delta Carrier Group Inc deploys multiple systems to detect potential robocall activity based on statistics such as average call duration, Answer Seize Ratio (“ASR”), and call count carrier/consumer reports. As part of its robocall mitigation program, Delta Carrier Group Inc provides the following solutions on its network to help minimize the impact of illegal or unwanted robocalls on customers:

1.1 Delta Carrier Group Inc deploys the phone service only to its known networks. Networks that Delta Carrier Group Inc monitors and manages.

It is a closed environment. At any given time it is known who made the call, where the call is going and to who has accepted the incoming call.

1.2 Delta Carrier Group Inc monitors all the outgoing and incoming phone calls and can proactively identify and block any customer’s unapproved behavior.

1.3 Delta Carrier Group Inc implements auto ban function on its systems. This permanently bans and/or blocks all communication traffic or attempts of communication coming from an outside network that is not managed or approved from Delta Carrier Group Inc.

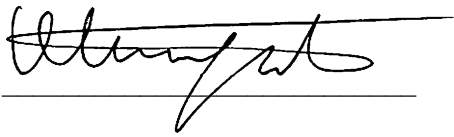
1.4 Delta Carrier Group Inc is constantly improving and upgrading its procedures, plans, and systems to better prevent all and any legal calling activity.

2. COMMITMENT TO RESPONDING TO TRACEBACK REQUESTS

Delta Carrier Group Inc is committed to responding fully and in a timely manner to all trace-back requests from the Commission, law enforcement, the industry trace-back consortium, co-operating with such entities in investigating and stopping any illegal robocalls that use its service to originate calls.

Sincerely

George Shterjov IT manager

A handwritten signature in black ink, appearing to read 'George Shterjov', is written over a horizontal line.