



Robocall Mitigation Policy

GreaterTransmit

I. Overview

This mitigation plan is submitted on behalf of GreaterTransmit, an Independent MSP Provider / Fiber Internet Provider, installing Sangoma Phone Systems. GreaterTransmit serves customers in the local areas of Southern California and is not a provider of general voice traffic to online customers. Our customer base is local personal clients only.

Greater transmit uses Sangoma VoIP Innovations for all inbound and outbound calling with their STIR/SHAKEN

II. General Prohibition Against Illegal Robocalling

GreaterTransmit end user services are subject to restrictions contained in its published legal notices and all executed services orders include the requirement that service is provided pursuant to its terms of service ("TOS") requirements.

Its existing TOS prohibit activities normally associated with Robocalling including, but not limited to:

Robocall Mitigation Policy

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call
- violating any applicable local, state, or federal law; using the GreaterTransmit service to engage in or in connection with fraudulent activities
- In addition, the company is updating its TOS to expressly reference the prohibition on robocalling and all current subscribers will receive notice of the publication of its updated TOS.

GreaterTransmit end users are notified that GTX may take action up to suspension or termination of service for violation of the TOS.

III. Know Your Customer

GTX utilizes the mitigation technique of "Know Your Customer." GTX is a small established provider that maintains a close relationship with its subscribers. Its customers are generally "mom and pop" users and none of its total customer base have enough call paths to generate the high volume of traffic associated with robocalling allowing us to use targeted in-house analytics to monitor, alert and apprehend suspected robocalling activities.

GTX has a screening for new customers requesting service at or above large volume calling capability:

- We will not deploy large volume calling capability as a residential service or at an address shown in the company records as being residential
- Businesses requesting large volume calling capability must provide a tax ID and verification as to the nature of the business
- We verify addresses to look for overlapping / multiple deployed voice path subscriptions
- A GTX representative may visit the premise of the business to verify the number of users at the location is appropriate for the volume of calling

Traceback and Enforcement Cooperation

GTX will actively cooperate with the traceback community including the FCC, law enforcement.

GTX will dedicate sufficient resources to provide prompt and complete responses to traceback requests.