

1 General Prohibition Against Illegal Robocalling

ISP Telecom 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:

- a) providing altered, deceptive, or false information about the identity of the sender or the origin of a
- b) violating any applicable local, state, or federal law; using the ISP Telecom 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.

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

2 Verification of the Customer

ISP Telecom utilizes customer public records to identify new subscribers.

Outgoing traffic from the customer is monitored for the high volume of traffic associated with robocalling allowing us to use targeted in-house analytics to monitor, alert and apprehend suspected robocalling activities.

ISP Telecom has set a call path level based on its average customer size. The level – referred to as “large volume calling capability” – is subject to change.

ISP Telecom provides a subscription-based, non-commercial legal robocalling product and we educate any subscribers or potential subscribers (such churches, school systems) regarding legal versus illegal robocalling activities to insure they are compliant in their use of the product.

ISP Telecom serves a small number of long-time business end users with large volume calling capability who are being directly contacted to review with them ISP Telecom’ policies and efforts to prevent the ISP Telecom network from being used for illegal robocalling.

3. Network Monitoring

ISP Telecom has deployed the in-house developed script that provides detailed live analysis and reporting on outbound traffic to identify potential illegal robocalling by detecting and flagging for review, suspicious calling patterns.

4. Traceback and Enforcement Cooperation

ISP Telecom will actively cooperate with the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG) to investigate and stop illegal robocalls. ISP Telecom will dedicate sufficient resources to provide prompt and complete responses to traceback requests.