



Telco Experts Robocall Mitigation Plan

Since the passage of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act,¹ the Federal Communications Commission ("FCC") has adopted a series of new rules to combat illegal robo-calling traffic.² Telco Experts LLC adopts this Telco Experts Robocall Mitigation Plan to outline the affirmative steps Telco Experts undertakes in its roles as a voice service provider and a voice reseller, to avoid originating, carrying or processing illegal robocall traffic, through verifying the identity of its retail and upstream providers, monitoring the traffic on its network, collaborating with the state and federal governments and various industry groups, and updating our third-party contracts to reflect these requirements and measures.

Telco Experts is a non-facilities-based reseller of voice services. We do not originate calls on our own network and currently do not have the infrastructure to implement STIR/SHAKEN. All calls originate from our underlying carriers, who are responsible for the implementation of STIR/SHAKEN where applicable.

THIRD-PARTY VERIFICATION PROCESS, KNOW YOUR UPSTREAM SERVICE PROVIDER

During the initial phase of account set-up and periodically throughout the business relationship, Telco Experts confirms the identity of any customers and voice vendors with which Telco Experts exchanges voice traffic domestically and internationally. This confirmation occurs through obtaining certain information about the entity and validating such information through government identification or other authentication controls prior to the execution of any service contract with such entity, pursuant to our third-party management policy. For all voice vendors, Telco Experts also validates the FCC 499A Filer ID number and Robocall Mitigation Database ("RMD"), which also fulfills our obligations to "Know Your Upstream Services Providers". Lastly, any of our personnel that interact with our customers and vendors are also trained regularly on the importance of collecting, validating and capturing the pertinent information during the onboarding process and updating such information as needed.

STIR/SHAKEN – Option 3 - No STIR/SHAKEN Implementation

Telco Experts LLC operates as a reseller of voice services without its own switching or transmission infrastructure. As such, we do not originate calls directly on any owned network and lack the technical resources to deploy STIR/SHAKEN. All call origination is handled by our upstream providers, who are certified in the Robocall Mitigation Database and/or have implemented STIR/SHAKEN.

TRACEBACK

Telco Experts commits to cooperating with the FCC, law enforcement, and the industry traceback consortium in investigating and stopping any robocallers that use our service to originate unlawful robocalls.

Telco Experts will respond fully within 24 hours to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and cooperate with such entities in investigating and stopping any robocallers that use our service to carry, process, or originate robocalls.

¹ Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act, Pub. L. No. 116-105 (2019) (TRACED Act).

² 47 C.F.R. §64.6300-64.6308.



TELCO EXPERTS

VOICE & DATA SOLUTIONS

ENFORCEMENT

All voice traffic that originates on our network is subject to the attached Robocall Mitigation Plan. Telco Experts and/or any entity for which the filing entity shares common ownership, management, directors, or control have never been the subject of a formal FCC, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program. Telco Experts has not been prohibited by the FCC from filing in the Robocall Mitigation Database.

ROBOCALL MITIGATION PLAN

For a portion of the calls traversing our upstream carrier network we have access to call analytics software provided by VoipMonitor to monitor all outbound voice traffic in real-time to prevent the origination or transit of illegal robocalls. The combined analytics capabilities of these platforms provide detailed reporting to identify suspected illegal robocalls. The system alerts us if we process outbound calls where the calling number has a poor reputation or is invalid, unallocated, or listed on a Do Not Originate (DNO) list.

Our mitigation processes are uniformly applied to all outbound traffic, regardless of our position within the call chain.

Upon identification of anomalous or suspicious call activity, we conduct immediate investigations to determine whether the caller or upstream provider is attempting to originate or transit unlawful robocalls. If the traffic is assessed as likely unlawful, we issue a formal warning requiring cessation of such traffic. Continued transmission of suspect traffic results in the swift termination of services to the offending entity.

KNOW YOUR CUSTOMER

We adhere to caller ID authentication best practices for verifying caller identity and ensuring the operational legitimacy of both new and existing customers, as outlined by the NANC Call Authentication Trust Anchor (CATA) Working Group. Our vetting process involves the collection and thorough review of entity-identifying information to establish an authenticated relationship with the customer. This includes determining whether the customer is subject to any enforcement actions that restrict their calling activities, such as bans on initiating telemarketing calls.

Additionally, we validate, when feasible, that the customer has a legitimate right to use the calling numbers they assert.

Our customer contracts explicitly prohibit the initiation of illegal robocalls. If we detect a customer engaging in suspicious robocall activity, we issue a warning to cease such behavior. If the unlawful traffic persists, we take immediate action to terminate their service.

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