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ROBOCALL MITIGATION PLAN

General Prohibition Against Illegal Robocalling

EGATE Networks 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.

The EGATE TOS prohibit activities normally associated with Robocalling including, but not limited to:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a
- violating any applicable local, provincial, or federal law; using the EGATE Networks service to engage in or in connection with fraudulent activities

EGATE Networks' end users are notified that EGATE Networks may suspend or terminate the service of a customer who violates of the TOS.

Verification of the Customer

EGATE Networks 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 in-house analysis to monitor, alert and mitigate suspected robocalling activities. EGATE Networks has sets call path levels based on its average customer size. The level – referred to as "large volume calling capability" – is subject to change. EGATE Networks educates subscribers or potential subscribers regarding legal versus illegal robocalling activities to insure they are compliant in their use of the product. EGATE Networks serves a small number of long-time business end users with large volume calling capability who we work closely with to review with them EGATE Networks' policies and efforts to prevent the EGATE Networks network from being used for illegal robocalling.

Network Monitoring

EGATE Networks has deployed systems developed in house that provides detailed live analysis and reporting on outbound traffic to identify potential illegal robocalling by detecting and flagging for review, suspicious calling patterns.

Traceback and Enforcement Cooperation

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