

LENOX TECHNOLOGIES, INC.

Robocall Mitigation Plan

December 2021

STIR/SHAKEN IMPLEMENTATION

LENOX TECHNOLOGIES, INC. ("Company") is a small Managed Services Provider (MSP), offering VoIP services to small-to-medium-size businesses. The Company has implemented the following Robocall Mitigation Plan to detect and prevent unlawful robocalls from originating on its network. All calls that originate on the Company's network are subject to the described robocall mitigation program.

ROBOCALL MITIGATION

The FCC Order lists three affirmative obligations for voice service providers: (1) Respond to traceback requests from the Commission, civil and criminal law enforcement, or the Industry Consortium; (2) Take steps to effectively mitigate illegal traffic when it receives notifications of such traffic from the Commission through its enforcement bureau; and (3) implement effective measures to prevent new and current customers from using its network to originate illegal calls.

1. Traceback Requests

The Company commits to responding in a timely manner and supporting all traceback requests from the FCC, and the Industry Traceback Group (ITG)

Traceback Contact Information

Name	Title	Contact Information
Yves Charles	President	P: 754-234-4599 E: ycharles@lenoxtech.com

2. Take Steps to Mitigate Illegal Traffic

If the Company is notified of traffic patterns consistent with illegal robocalls, or we have reason to suspect illegal robocalling or spoofing is taking place over our network, the Company will seek to identify the party that is using our network to originate, route, or terminate these calls and take appropriate action.

3. Measure to prevent origination of illegal calls

Know Your Customer

The Company only serves low-risk customers who all have a personal interaction with a

representative from the Company. All customers are vetted by collecting a physical billing address and W-9 information.

Telephone Number Validation

Customers use numbers assigned by the Company or ported-in using procedures per NAPA.

Call Blocking

For calls originating from our network, the Company provides the following Robocall Protection:

- Detailed reporting identifying suspected illegal robocalls and alerts if calls originate where the calling number is invalid, unallocated, on a Do-Not-Originate list.
 - If the platform detects a suspected robocalling patterns the Company will take appropriate action which may include suspending or terminating the subscriber.
 - Supports real-time query to service to determine if a number originating on your network could be a robocall. Such calls can be blocked, or the terminating party can be notified via CNAM.
 - For each new instance of robocalling using the Operating Service Provider (OSP) TNs, an alert is sent to the OSP in near real-time. This alert will result in the OSP (manually) blocking the TN and all TSPs being alerted via CNAM, through an overlay such as "ROBOCALLER". The CNAM alerting helps address instances of spoofing of TNs that are not going through the OSP that owns the number.
4. The Company has prepared an Acceptable Use Policy ("Policy") as a guide for its customers to understand the intended and permissible uses of our service, and to prevent exploitation, fraud, and abuse of our unlimited calling plans and features. This policy is applicable to all our services.

CONCLUSION

LENOX TECHNOLOGIES, INC. submits this Robocall Mitigation Plan to comply with the Federal Communications Commission's Fourth Report and Order (FCC 20-187). This plan is a work in progress and will be supplemented as the company gains more exposure to and experience with these processes.