

Tritel Robocall Mitigation Plan

Overview

Tritel Communications Inc. is a VoIP service provider based in the Philippines and it started operations in 2010. It initially offered A-Z termination and origination to local entities (enterprises and BPOs). Since 2019, Tritel's focus has changed to system development and support, and offering CCAAS and UCAAS. While it still maintains some of its original clients as a VoIP provider, it no longer actively pushes VoIP as part of its main service portfolio and has minimal traffic going to the US.

As part of its commitment to robocall mitigation, Tritel informed its customers about the FCC's efforts to prevent illegal robocall traffic and that Tritel will cooperate in these efforts and activities.

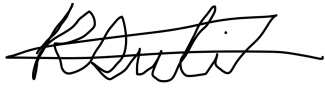
Role in call chain

Based on FCC's terminologies, Tritel Communications Inc. is classified as a *foreign voice service provider* as its role in the call chain.

Tritel commitments to Robocall mitigation

1. Tritel is committed to performing reasonable steps to mitigate illegal robocall voice traffic from passing through its network and going into the US.
2. Tritel commits to respond fully and with 24 hours, to traceback requests from official industry entities and will cooperate with such entities in investigating and stopping illegal voice traffic going to the US.
3. Tritel certifies that all calls that originate from its network and terminate to the US are subject to robocall mitigation.
4. Tritel confirms that it has not been previously prohibited from filing in the Robocall Mitigation Database and is currently not under any investigation by any official entities.
5. Tritel had included provisions in its service agreement that allow service suspension and/or termination if any fraud or illegal traffic originates from its customer.
6. Tritel has implemented a KYC process for both existing and possible new customers. The KYC form (included below) allows Tritel to verify the customer's identity, registered address, and owners (included in the required copy of business registration).

Certified by:

A handwritten signature in black ink, appearing to read 'RSulit', with a long horizontal flourish extending to the right.

Reynaldo E. Sulit
President / COO

Tritel Communications, Inc.

Enterprise KYC form

Corporate information

1. Customer legal name _____
 - a. Please provide copy of business/SEC registration
 - b. Type of business/industry: _____

Contact information

2. Physical Address: _____
3. Billing Address (if different): _____
4. URL: _____
5. Technical contact:
 - a. Name: _____
 - b. Email: _____
 - c. Landline: _____
 - d. Mobile: _____
6. Billing contact:
 - a. Name: _____
 - b. Email: _____
 - c. Landline: _____
 - d. Mobile: _____
7. Operations contact:
 - a. Name: _____
 - b. Email: _____
 - c. Landline: _____
 - d. Mobile: _____
8. Management contact:
 - a. Name: _____
 - b. Email: _____
 - c. Landline: _____
 - d. Mobile: _____

Business purpose and activities

9. What type of voice services are needed (SIP trunk, DID, Tollfree, international termination, US termination) : _____
10. Do you engage in telemarketing ? Yes _____ No _____
 - a. If yes, please describe: _____
 - b. Do you use outbound /auto-dialers ? Yes _____ No _____

CERTIFICATION

The undersigned certifies that she/he is an officer of the Customer and that the Customer has knowledge of the Philippine and US Telecommunication Laws and that Tritel is bound to comply with such laws.

The undersigned also confirms that Customer complies with these laws and consents to disclose all details if questions arise regarding potential violations of these laws.

The undersigned further states that Customer is aware of the communications industry traceback groups, certifies that Customer will respond promptly to all traceback requests and take effective steps to address any illegal traffic transmitted on its network.

I verify that I am authorized to legally bind the Customer by my signature.

Name: _____

Title: _____

Signature: _____

Date: _____