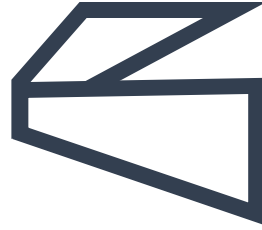


ROBOCALL MITIGATION PLAN

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I- BACKGROUND

Under the authority Congress granted the Federal Communications Commission (“FCC” or “Commission”) in the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act, the Commission has adopted rules requiring voice service providers, like TOP IT SOLUTIONS, (“TOPIT”), to implement STIR/SHAKEN caller ID authentication technology in the Internet Protocol (IP) portions of their networks. 47 CFR § 64.6301.

The FCC requires that all voice service providers certify, by June 30, 2021, in the Commission’s [Robocall Mitigation Database](#) whether they have implemented STIR/SHAKEN or, if subject to an applicable extension, that they have documented and instituted a robocall-mitigation plan to help combat the origination of illegal robocalls on their networks. The Commission has explained that a robocall-mitigation program is sufficient if the detailed practices in the plan can “reasonably be expected to significantly reduce the origination of illegal robocalls” and the voice service provider complies with the practices it describes in its filings.

TOPIT is dedicated to stopping illegal calls from originating on its network and undertaking commercially reasonable efforts to monitor the calls coming into its network, consistent with FCC regulations.

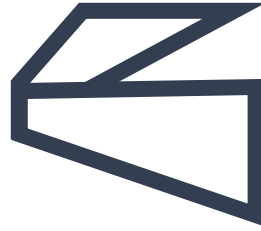
This document outlines TOPIT’s Robocall Mitigation plan.

II- KNOW YOUR CUSTOMER(“KYC”) Standards

TOP IT is a voice service provider that focuses its business and operations on the business end user and wholesale customer segments of the voice services communications market. As part of its customer-onboarding process, TOP IT undertakes various commercially reasonable precautions to verify a given customer’s identity as part of entering into a formal written agreement. All prospective customers participate in an in-person or telephonic enrolment process. TOP IT investigates the prospective customer’s background, such as checking for a company website, the amount of time the business has been open, and other indications of a legal, operating business. Among other data points collected and, as appropriate, verified, as part of those processes TOP IT gathers the following customer-identifying facts and circumstances:

- Customer business name,
- State or country of incorporation,
- Physical business location,
- Contact person(s),

ROBOCALL MITIGATION PLAN



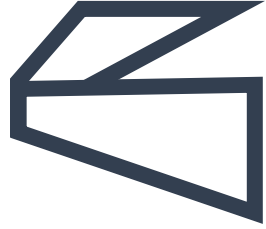
III- ACCEPTABLE USE POLICY

As part of its customer-on boarding process, all of TOP IT's customers contractually agree to various terms and conditions, including a commitment to comply with TOP IT's Acceptable Use Policy (AUP). Among other things, this AUP prohibits:

- Using the Services to engage in any activities that are illegal, abusive, false, fraudulent, deceptive or misleading, or any activity that exploits, harms, or threatens to harm children.
- Engaging in any unsolicited advertising, marketing, or other unlawful activities using the Services, including, without limitation, any activities that violate laws applicable to advertising, electronic communications, and telemarketing, including, but not limited to, Section 5 of the FTC Act (15 U.S.C. § 45), the CAN-SPAM Act (15 U.S.C. §§ 7701-7713), the Telemarketing Consumer Fraud and Abuse Prevention Act (15 U.S.C. §§ 6101-6108), the Federal Trade Commission Telemarketing Sales Rule (16 C.F.R. § 310 et seq.), the Telephone Consumer Protection Act (47 U.S.C. §§ 227), the Federal Communications Commission regulations (47 C.F.R. 64.1200 et seq.) and orders implementing the Telephone Consumer Protection Act, and all federal and state Do Not Call and calling-time restriction laws and regulations.
- Using TOP IT's Services in any way that fails to conform to any applicable industry guidelines and standards, including, without limitation, the CTIA Messaging Principles and Best Practices, Short Code Registry Best Practices, and Short Code Monitoring Handbook.
- Creating a false identity, forged email address or header, phone number, or otherwise attempting to mislead others as to the identity of the sender or the origin of a message or phone call, including failing to comply with the Truth in Caller ID Act.

TOP IT's contracts with its customers stipulate that TOP IT is authorized to suspend and/or terminate all Services in the event of an AUP violation

ROBOCALL MITIGATION PLAN



IV- STIR-SHAKEN CAPABILITIES

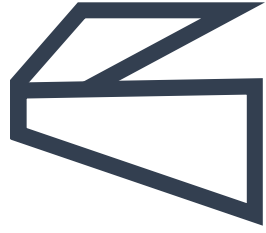
As of June 30, 2021, TOP IT has a mix of TDM and SIP traffic on its network. The current status of its STIR/SHAKEN implementation is:

☒ None of my traffic is attested yet

TOP IT has fewer than 100,000 subscribers and is therefore eligible for the STIR/SHAKEN implementation exemption for small carriers under 47 CFR § 64.6304. The company requires this extension to complete the implementation of the STIR/SHAKEN technology. TOP IT is judiciously working to prevent unlawful robocalls from originating on its network while in the process of installing the new STIR/SHAKEN authentication architecture. In the meantime TOP IT has contracted with multiple carriers to attest, at the applicable levels, its customers' traffic originated on the TOP IT network. In cases where TOP IT's end users use telephone numbers to which they have subscribed from TOP IT, TOP IT has a documented, verified relationship between the originating end user and their telephone number(s) used to originate their calls.

V- NETWORK MONITORING

TOP IT has established methods and procedures to monitor its network and detect / prevent fraudulent activity. The company uses call authentication, call labelling, and call blocking services to protect its networks and consumers from harmful calls. It also uses software to monitor its network's daily usage and has established methods and procedures in place to address issues as soon as they are identified



VI- TRACEBACK COOPERATION

TOP IT will comply fully with all conditions set forth in the FCC'S 2020 Report and Order mandating the implementation of the STIR/SHAKEN framework, as well as with the Commission's rules and policies more generally.

TOP IT will provide valid law enforcement and regulatory agencies with the relevant non-proprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities, and implement mandated robocall mitigation procedures to the fullest extent possible with the goal of maximizing the mitigation of illegal robocalls.



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