

NCT Holdings LLC DBA Executel Robocall Mitigation Plan

Executel performs the following roles in the call chain to mitigate robocalls:

Know Your Customer

We follow the caller ID authentication best practices for vetting caller identity and operational legitimacy for new and existing customers as described by the NANC Call Authentication Trust Anchor Working Group.

This process includes the collection and review of entity-identifying information to confirm that we have an authenticated relationship with the customer. We use this authenticated information to determine whether the customer is subject to any enforcement actions that restrict the type of calling that they may do.

We also validate, when possible, that the entity has a legitimate right to use its asserted calling numbers. We use this information to support the attestation level we assign to calls that we originate for that customer.

Our contractual provisions with customers prohibit them from initiating illegal robocalls. If we find a customer initiating suspicious robocalls, we warn them to stop. If such traffic continues, then we terminate their service.

Know Your Upstream Provider

We confirm that the upstream provider has a certification in the Robocall Mitigation Database. We will not accept voice traffic from an unregistered provider.

We establish an understanding of the upstream provider's role in the call path for the traffic they will send to us, for example, whether they are acting as an originating voice service provider, a foreign intermediate provider, or a U.S.-based intermediate provider. We use this information to understand whether we will be obligated to authenticate unsigned traffic that we receive from them.

Traceback

We respond within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium. We cooperate fully with such entities in investigating and stopping any illegal robocallers that use our service to originate, carry, or process illegal robocalls.

Robocall Mitigation Program

We use call analytics software provided by Denovo Labs to monitor all outbound voice traffic in real-time to prevent the origination or transit of illegal robocalls.

The software provides 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 on a Do Not Originate list.

We perform the same mitigation steps for all outbound calls regardless of our role in the call chain for a particular call.

We immediately investigate any identified suspicious calls to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls. If we determine that the traffic was likely unlawful, then we warn them to stop sending such traffic. If they continue to send traffic that appears to be unlawful, then we terminate their service.

Ownership and Management Structure

NCT Holdings LLC is a privately owned company, solely owned and controlled by Nathaniel Turbiner. As the sole owner, Nathaniel Turbiner exercises full management and operational control over the company. There are no additional executive officers or board members. The company has no parent companies, subsidiaries, or affiliated entities.