



ROBOCALL MITIGATION PLAN

MINet Solutions

Robocall Mitigation Plan

MINet Solutions is committed to cooperating with the Federal Communications Commission (FCC), law enforcement, and the industry in investigating and stopping any illegal robocallers that it learns are using our service to originate calls or transit calls into the United States and territories.

We are a reseller of SEGRA and Bandwidth Networks (referred to below as: “The Company or Company”), and do not have the capability to implement STIR/SHAKEN. SEGRA and Bandwidth has implemented STIR/SHAKEN protocols in their SIP and IP Voice networks. MINet along with our upstream partners SEGRA and Bandwidth have a partnership to help mitigate Robo Calls / Fraudulent calls. By implementing Innovative Systems Terminating Call Manager feature on our incoming DM & SIP trunks we have been able to block or challenge telemarketing calls and spoofed calls. This feature allows us to add known telemarketers’ numbers manually and it also auto updates weekly from the FCC’s know telemarketers list. MINet frequently pulls daily reports from our call history server.

MINet Solutions nor any of our executives or principals have a history of enforcement actions for illegal robocalls, TCPA or TSR violations or related state law violations. MINet Solutions and the Company commit to fully responding within 24 hours to all traceback requests from the ITG, the TPTG, the FCC, and law enforcement. Our Up-Stream providers cooperate fully with these groups to investigate and stop any illegal robocallers from using service to carry or process illegal calls. When notified by the FCC’s Enforcement Bureau, The Company shall block and report identified illegal traffic, and any substantially similar traffic, on an ongoing basis (unless The Company’s investigation determines that the traffic is not illegal) when providers receives actual written notice of such traffic from the Enforcement Bureau. If the provider determines that the identified traffic is not illegal, The Company shall provide the Enforcement Bureau with an explanation as to why The Company reasonably concluded that the identified traffic is not illegal, and what steps it took to reach that conclusion.

- MINet Solutions and its providers utilizes a combination of internal tools and third-party solutions to check for Do Not Originate (DNO) numbers.
- The Company utilizes a combination of internal tools and third-party solutions to detect invalid phone number formats, area codes and unassigned number blocks.
- The Company also utilizes data analytics to detect and investigate irregular and unexpected calling patterns, originating number use against customer profiles.
- The Company uses data systems for analytics and reviews to identify illegal robocalling.

- MINet follows the best practices for vetting caller identity described by the NANC Call Authentication Trust

MINet Solutions practice includes:

- Monitoring the network to identify suspicious traffic patterns.
- Limiting customers' capacity via call per second and/or concurrent session limits.
- Regularly checking call patterns for possible abusive traffic.

All new customers are verified with a combination of electronic and manual verification systems, credit reviews, references from trusted industry members, and previous experiences with customer executives and employees. MINet Solutions monitors the capabilities of new accounts until these appropriate processes are complete.

MINet Solutions utilizes SIP platforms from:

1. SEGRA Networks
 - a. 11215 N Community House Rd, Charlotte, NC 28277
2. Bandwidth Networks
 - a. 2230 Bandmate Wy, Raleigh NC 27607

MINet Solutions reserve the right to refuse traffic from any party at any time where robocalling or use of originating numbers that are not valid or they are not authorized to use has occurred or is suspected. The Company is able to block the originating number(s), terminating numbers(s), trunk(s) or customer, including termination of customer relationship to prevent robocalling, invalid originating number or spoofed origination number transiting the Company's networks.

In addition, we have implemented a Call Abuse Policy, as it pertains to the TRACED Act, and have published the following policy to our "Terms of Service and Use" and have notified our customers of the policy as copied below:

"Any call originated on MINet Solutions network is subject to inspection and investigation if the call is suspected of being fraudulent, abusive, or illegal. Calls meeting any of these criteria will be blocked. If these conditions are repeated, becoming excessive, the subscriber may be disconnected from Digital Technology Solutions, Inc.'s network, may be subject to further investigation by the FCC for enforcement of the TRACED Act and the subscriber may be subject to fines and penalties imposed by the FCC or the jurisdiction. MINet Solutions is complete STIR SHAKEN compliant. All MINet customers are served on the MINet SIP Trunking network."