



ROBOCALL MITIGATION POLICY

1 Introduction

1.1 Scope

The FCC has implemented policies and actions to help combat unlawful robocalls and malicious caller ID spoofing through “The Telephone Robocall Abuse Criminal Enforcement and Deterrence Act,” or TRACED Act. Telephone companies, like UStronics/TexTalk, are required to implement new call authentication and identification technologies that help verify calls are legitimate before ever reaching consumers. This technology will assist UStronics/TexTalk in scanning our phone network to identify, investigate, and block problem numbers.

1.2 Revision History

Revision	Date	Record of Changes	Approved By
1.0	10/12/2021	Initial Issue	Senior Management
1.1	04/21/2022	Reviewed and approved	Senior Management
2.00	12/24/2024	Updated to reflect UStronics' response to FCC Order DA 24-1235, including details on STIR/SHAKEN implementation, Robocall Mitigation Plan specifics, and compliance with new FCC requirements	Senior Management

1. UStronics Inc. and its wholly-owned operating subsidiaries, including TexTalk have adopted this Robocall Mitigation Policy on its network.
2. The FCC requires that all providers certify in the Robocall Mitigation Database their status for compliance with STIR/SHAKEN. Those not yet fully compliant must implement and certify the implementation of a Robocall Mitigation Plan to ensure that this illegal traffic does not originate on their networks as they work within the industry to become fully compliant. The Commission requires voice service providers to develop a Robocall Mitigation Plan that details the reasonable steps taken to avoid originating illegal robocalls and demonstrate a commitment to respond to traceback requests to cooperate with investigating and stopping illegal robocalls is filed in the Robocall Mitigation Database. UStronics/TexTalk is partnering with a trusted provider such as Twilio to implement STIR/SHAKEN in its network, and has implemented this policy for compliance.
UStronics certifies that details the specific measures implemented to prevent and monitor potential illegal robocalls, including: (1) a description of the steps taken to block or mitigate suspected illegal calls; (2) detailed call analytics systems and procedures used to identify and terminate any illegal or suspicious traffic; (3) the procedures by which we know our



upstream providers; and (4) the role(s) the Company plays in the call chain (e.g., originating, gateway, or intermediate provider).

3. General Prohibition Against Illegal Robocalling

UStronics/TexTalk end-user services are subject to restrictions contained in its published legal notices and all executed services orders include the requirement that service is provided pursuant to its terms of service ("TOS") requirements. Its existing TOS prohibits activities normally associated with Robocalling including, but not limited to:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable local, state, or federal law; using the UStronics/TexTalk service to engage in or in connection with fraudulent activities

In addition, the company is updating its TOS to expressly reference the prohibition on robocalling and all current subscribers will receive notice of the publication of its updated TOS. UStronics/TexTalk's end users are notified that UStronics/TexTalk may take action up to suspension or termination of service for violation of the TOS.

4. Know Your Customer

UStronics/TexTalk utilizes the mitigation technique of "Know Your Customer."

UStronics/TexTalk is a small long established provider that maintains a close relationship with its subscribers. UStronics/TexTalk has set a call path level based on its average customer size. UStronics/TexTalk has a screening for new customers requesting service at or above large volume calling capability levels:

- We will not deploy large volume calling capability as a residential service or at an address shown in the company records as being residential
- Businesses requesting large volume calling capability must provide a tax ID and verification as to the nature of the business
- We verify addresses to look for overlapping / multiple deployed voice path subscriptions
- A UStronics/TexTalk representative may visit the premise of the business to verify the number of users at the location is appropriate for the volume of calling

UStronics/TexTalk serves a small number of long-time business end users with large volume calling capability that are being directly contacted to review with them UStronics/TexTalk's policies and efforts to prevent the UStronics/TexTalk network from being used for illegal robocalling.

5. Network Monitoring?

UStronics/TexTalk is continuing the development of custom software in-house that allows for real-time monitoring of traffic and will flag call patterns indicative of potential illegal robocalling. Additional capability is being added to the software which will automatically disable any subscribers associated with flagged call patterns.

6. Traceback and Enforcement Cooperation?

UStronics/TexTalk will actively cooperate with the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG) to investigate and stop illegal



robocalls. **Our plan and policies confirm that the Company will respond to FCC and/or law enforcement traceback requests within 24 hours and cooperate with any ongoing investigations.

7. What are robocalls?

Robocalls are calls made with an autodialer or contain a message made with a prerecorded or artificial voice. Keep in mind that many robocalls are legal. Companies or organizations with written consent on paper or through electronic means from customers can lawfully make a prerecorded call or auto-dialed call to a home or a wireless number from whom they have consent. Many robocalls provide helpful information such as appointment reminders, subscription refill reminders, school announcements, church announcements, etc. Unfortunately, the majority of robocalls are illegal, and reducing these calls requires a complex solution that helps identify these calls in real time to block them without blocking lawful calls.

8. What is Ustronics/TexTalk doing to help?

To help reduce the number of suspected illegal calls that may originate from our network, Ustronics/TexTalk is implementing this Robocall Mitigation Policy, at no additional charge to our customers, effective 12 October 2021. This policy is designed to allow Ustronics/TexTalk to verify that calls originating over our network are legitimate numbers belonging to a valid Ustronics/TexTalk customer, and to block numbers that are identified as SPAM or fraudulent calls. If a customer's number is flagged, Ustronics/TexTalk will contact the customer to inform them of the FCC rules for robocalling. Failure to comply can result in the customer's number being blocked by other carriers and can result in Ustronics/TexTalk discontinuing voice service to that customer for violation of the Standard Terms and Conditions. When appropriate, Ustronics/TexTalk will add the customer's number to its approved robocall list. Customers may opt out of this free call-blocking service by calling Ustronics/TexTalk at 1-888-726-5262, or by sending an email at support@ustronics.com.

9. What can you do to help reduce robocalls?

- Read the consumer tips from the Federal Communication Commission (FCC.gov) to stop unwanted robocalls.
- Register your phone numbers on the Do Not Call List. Although this Federal Trade Commission registry won't spare you from calls from scammers intent on breaking the law, it should prevent you from receiving "live" telemarketing calls, which are regulated by the federal government but are not illegal.
- Don't answer calls from blocked or unknown numbers.
- Don't answer calls from numbers you don't recognize.
- Don't call back numbers you don't recognize. It could be a one-ring scam. One-ring scams want you to call the number back, and then you'll incur charges.
- If someone calls you and claims to be with XYZ company, hang up and call the company yourself. Use the company's website to find an official number.
- Always check on a charity (for example, by calling or looking at its actual website) before donating.
- Be diligent and don't give out personal information over the phone.



- If you answer a call and hear a recording such as "Hello, can you hear me?" just hang up.
- The same goes for a call where you're asked to press a number before being connected to a representative.
- When you answer a call and interact with the voice prompt or by pressing a number, it lets the spammer know your number is real. They can then sell your number to another company or begin targeting your number more frequently.

10. How can I report a telephone number that is being improperly blocked or mislabeled?

How can I report a telephone number that is being improperly blocked or mislabeled? If you are a consumer and feel that your number is being blocked in error, please contact UStronics/TexTalk at 1-888-726-5262. If you are a business or enterprise and think your telephone number is being blocked or mislabeled, please contact UStronics/TexTalk at 1-888-726-5262.

11. Compliance With Newly Required Information

Effective February 26, 2024, the FCC's amended rules require additional disclosures in RMD certifications. UStronics has ensured the following items are included or updated in its RMD certification:

1. Role in the Call Chain: UStronics has explicitly stated whether the Company functions as an originating provider, gateway provider, or intermediate provider in our RMD filing.
2. STIR/SHAKEN Exemptions/Extensions: UStronics has indicated whether it operates under an FCC-granted extension or exemption regarding STIR/SHAKEN compliance (if applicable).
3. Affiliated Entities: UStronics has provided declarations regarding any affiliated entities potentially subject to Commission or law enforcement actions for allegations of illegal robocalling.

12. Confirmation of Ongoing Compliance

Moving forward, the Company will:

- Maintain its robocall mitigation plan to ensure it remains current and effective.
- Periodically review its STIR/SHAKEN implementation, updating and improving the system as needed.
- Promptly file any updated certifications or notifications with the FCC to remain in continued compliance.
- Immediately respond to any further inquiries from the Commission or Bureau.

13. What does this mean for your company/organization if you engage in lawful robocalling?

UStronics/TexTalk will need to add your telephone number to its approved robocall list to ensure your outgoing calls are not blocked by our network. Robocall telephone number(s) may be submitted by calling our business office at 1-888-726-5262.

This updated policy integrates the information provided in the UStronics response to the FCC, providing a more comprehensive and current overview of their robocall mitigation efforts.