

Paragon Technology Inc. Robocall Mitigation Compliance with TRACED Act

Paragon Technology Inc. *dba* Paragon Voip (the “Company”) is committed to cooperating with the Federal Communications Commission (FCC), law enforcement, and the industry traceback consortium 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.

Traceback Cooperation

The Company commits to fully responding within 24 hours to all traceback requests from the ITG, the TPTG, the FCC, and law enforcement. The Company shall cooperate with these groups to investigate and stop any illegal robocallers from using Company’s service to carry or process illegal calls. When notified by the FCC’s Enforcement Bureau, Company shall block and report identified illegal traffic, and any substantially similar traffic, on an ongoing basis (unless Company’s investigation determines that the traffic is not illegal) when Company receives actual written notice of such traffic from the Enforcement Bureau. If Company determines that the identified traffic is not illegal, Company shall provide the Enforcement Bureau with an explanation as to why Company reasonably concluded that the identified traffic is not illegal, and what steps it took to reach that conclusion.

Know Your Customer (KYC)

The Company maintains a Know Your Customer Policy and practice which includes the following:

- Identify the customer’s business and verify that it is a legitimate business with intentions of normal phone usage. This is done by investigation of customer websites, publicly available corporate records searches and conversations and inquiries with direct representatives of the business.
- Monitoring customer call usage and minutes charges to recognize any unusually high call volume amounts that are indicative of robocall patterns.
- 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. The Company severely limits the capabilities of new accounts until these appropriate processes are complete.

***The company does not use data analytics as part of its robocall mitigation program.

Know your Upstream Providers

The Company has made sure to verify that Companies relied upon for upstream traffic are following FCC RMD regulations. Upstream providers are as follows:

PayG LLC dba Skyswitch (RMD0002940)

Arborcrest 1

751 Arbor Way, Suite 150

Bluebell, PA 19422

Phone: 747-777-8100

Email: Support@skyswitch.com

Call Abuse Policy

The Company reserves 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.