



Telecom One Inc.

Robocall Mitigation Plan

STIR/SHAKEN IMPLEMENTATION

Telecom One Inc. is a total reseller of services provided by Bandwidth.com (RMD0003709), our carrier partner, and does not have the capability to implement STIR/SHAKEN in our network. All the voice traffic that originates on the Company's network is subject to the robocall mitigation plan described below.

We have not been prohibited from filing a certification in the Robocall Mitigation Database.

Telecom One Inc., 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.

We use the affirmative and effective measures detailed below to prevent the origination or transit of illegal robocalls.

We follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group.

(<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

1. Telecom One Inc. resells service using Underlying Carriers ("Partners") and rely on their commitment and processes to combat Robocalls. Telecom One Inc. has no access to the SIP trunks provided by the Partners to our SIP PBX customers and therefore has no ability to monitor and detect calling patterns. Our Partners provide DIDs directly to our SIP PBX customers.

2. Telecom One Inc. commits to respond to all traceback requests from the Federal Communications Commission, law enforcement and the industry traceback consortium within 24 hours and to cooperate with such entities, and its Partners, in investigating and stopping any illegal robocallers from using its services to originate calls, and that all voice traffic that originates on its network is subject to this robocall mitigation program.

3. Telecom One Inc. screens all applicants for its services to determine if they intend to use such services for autodialing from a database of numbers for purposes of telemarketing without having received written permission from the called parties. Calls to wireline

numbers for purposes of political campaigning, market research or polling are deemed legal.

4. Telecom One Inc. commits, by contract with its Partners, that all users of its services comply with applicable laws prohibiting illegal robocalling and providing for blocking and/or termination of services for those that breach such provisions.

5. Telecom One Inc. relies on its Partners' commitment to continuously monitor calling patterns in and out of network(s) to identify fraudulent traffic, including robocalling, traffic pumping, and international toll fraud. Telecom One Inc. will block services to a customer if it determines that the customer is using the services for any illegal activities, including robocalling. Such customers' agreement will be terminated if the violation is determined to be intentional.