

ROBOCALL MITIGATION PLAN

Vistanet Telecommunications, Inc. (“Vistanet”) is an Asheville, NC-based telecommunications provider that provides hosted PBX and Voice Over Internet Protocol (VoIP) solutions tailored to businesses of all sizes. Vistanet offers the VoIP solution as a reseller of white-labeled services offered by Viirtue, Inc. (“Viirtue”). Vistanet does not control the softswitch, number porting or call trunking for the associated calls. Accordingly, Vistanet does not have the facilities necessary to implement STIR/SHAKEN. Vistanet has, however, adopted this robocall mitigation plan to establish procedures intended to limit the potential for the origination, carrying, or processing of unlawful robocalls from its voice services.

PROCEDURES TO MITIGATE OR STOP ROBOCALLS

I. KNOW YOUR CUSTOMER

Vistanet follows the North American Numbering Council (NANC) - Call Authentication Trust Anchor Working Group guidelines and best practices for vetting caller identity [NANC CallerID Best Practices](#).

This includes confirming the identity of Vistanet’s customers – (i) contact person(s); (ii) business location; (iii) state or country of incorporation; (iv) federal tax identification; and (v) the nature of our customers’ businesses. Vistanet also verifies that the requesting individual is authorized to

Vistanet’s services are targeted to small business usage. These customers are configured for service either off systems that cannot generate more than a single call at a time or are otherwise limited in the number of concurrent calls that would render an illicit robocalling platform from operating in a cost-effective manner.

II. CONTRACTUAL TERMS

Customers using Vistanet’s services agree to abide by the rules and regulations set forth in our services agreement. Vistanet prohibits customers/subscribers from engaging in illegal activity and/or activity that is abusive, harassing, deceptive, fraudulent, invasive of another’s privacy. Customers are informed that Vistanet has the right to immediately disconnect service if the company determines that a Customer has used the service for an unlawful purpose.

III. TRACEBACK

Vistanet commits to respond fully, within 24 hours, to all traceback requests from the Commission, law enforcement, and the Registered Traceback Consortium. In the event illegal robocallers use our system, Vistanet will cooperate with such entities’ investigation.

IV. ROBOCALL MITIGATION

Vistanet performs manual review of customer information to identify inconsistencies, high-risk

industries, and/or patterns indicative of potential fraud. Vistanet re-verifies accounts when they expand services, modify calling patterns, or exhibit unusual traffic. Existing customers with suspicious activity are subject to additional scrutiny.

Vistanet's underlying voice provider, Viirtue, has committed to being fully STIR/SHAKEN compliant. Viirtue uses analytics software provided by TransNexus to monitor all outbound traffic in real-time to prevent the origination or transit of illegal robocalls. The software provides detailed reporting to identify suspected illegal robocalls and alerts Viirtue as they process outbound calls where the calling number has a poor reputation or is invalid, unallocated, or on a Do Not Originate list. Viirtue immediately investigates any identified suspicious calls to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls. If Viirtue determines that the traffic was likely unlawful, it will warn us to stop sending the traffic and we will, in turn, immediately investigate. As needed, we take the following actions for illegal robocalls: (1) immediately investigate; (2) contact customer; (3) employ temporary call restrictions; (4) as needed, suspend or terminate service if traffic is unlawful or unjustified; and (5) coordinate with Viirtue for network-level protections.

V. KNOW YOUR UPSTREAM PROVIDER

Vistanet has an agreement in place with Viirtue to resell their VoIP offering to Vistanet's customers. Vistanet has confirmed that Viirtue is listed in the Robocall Mitigation Database. Viirtue also conducts network-level analytics to flag suspicious or illegal traffic.

VI. PLAN UPDATES

Vistanet will continue to monitor industry best practices and improve our internal processes to ensure our systems adapt to address the ongoing challenges affecting this industry.