

Two Brothers Telecom LLC. resells service using several Underlying Carriers (“Partners”), and relies on their commitment and processes to combat Robocalls. Two Brothers Telecom LLC. has no access to the SIP trunks or extensions provided from the Partners to our customers and therefore has no ability to monitor and detect calling patterns.

1. Two Brothers Telecom LLC commits to respond to all traceback requests from the Federal Communications Commission, law enforcement and the industry traceback consortium 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.

2. Two Brothers Telecom LLC screens all applicants for its services to determine if they are intending 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.

3. Two Brothers Telecom LLC 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.

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

5. STIR/SHAKEN IMPLEMENTATION EXTENSION

Two Brothers Telecom LLC does not have the capability to deploy STIR/SHAKEN as we are a reseller of hosted VoIP platforms provided by our partners and therefore is not subject to the Commission’s rules for implementation. Our Partners bear responsibility for implementation in the IP portions of their networks within the time set under the Commission’s rules consistent with 47 CFR § 64.6301(a).