



ADVANCE TELECOM GROUP INC. Robocall Mitigation Plan

There are a variety of mitigation techniques that Advance Telecom Group (ATG) utilizes to mitigate or entirely prevent the transmission of illegal robocall traffic. An overview of these approaches is listed below.

Know Your Customer: ATG CONFIRMS THE IDENTITY OF NEW COMMERCIAL CUSTOMERS BY COLLECTING INFORMATION SUCH AS PHYSICAL BUSINESS LOCATION, CONTACT PERSON(S), STATE OR COUNTRY OF INCORPORATION, FEDERAL TAX ID, AND THE NATURE OF CUSTOMER'S BUSINESS. THIS CAN HELP PREVENT ORIGINATING PROVIDERS ALLOWING ILLEGAL CALLS FROM GAINING ACCESS TO VOICE SERVICE PROVIDERS' NETWORKS.

MONITOR NETWORK TRAFFIC: ATG ANALYZES HIGH-VOLUME VOICE NETWORK TRAFFIC TO IDENTIFY AND MONITOR PATTERNS CONSISTENT WITH ROBOCALLS. THIS INFORMATION CAN ASSIST IN THE TRACEBACK PROCESS TO IDENTIFY THE SOURCE OF ILLEGAL CALLS.

REQUIRE TRACEBACK COOPERATION IN CONTRACTS: ATG FOR ALL NEW AND RENEGOTIATED CONTRACTS GOVERNING THE TRANSPORT OF VOICE CALLS, USE BEST EFFORTS TO REQUIRE COOPERATION IN TRACEBACK INVESTIGATIONS BY IDENTIFYING THE UPSTREAM PROVIDER FROM WHICH THE SUSPECTED ILLEGAL ROBOCALL ENTERED ITS NETWORK OR BY IDENTIFYING ITS OWN CUSTOMER IF THE CALL ORIGINATED IN ITS NETWORK.

REJECTION BY THE ORIGINATING PROVIDER: WHEN ATG LEARNS THAT THEIR PLATFORM IS BEING USED AS A CONDUIT FOR ILLEGAL ROBOCALLS, WE IDENTIFY THE OFFENDING CUSTOMER FROM THE CALL EXAMPLES PROVIDED BY THE RELEVANT PARTY (E.G., CALL SAMPLES PROVIDED TO THEM BY THE ITG), AND THEN EXAMINE ITS CALL DETAIL RECORDS (CDRs) FOR THAT PARTICULAR CUSTOMER. ATG EXAMINES THE CDRs FOR TELLTALE SIGNS OF ILLEGAL ROBOCALL TRAFFIC, SUCH AS HIGH CALL VOLUMES, LOW DURATION CALLS, SEQUENTIAL DIALING PATTERNS, AND CALL VOLUMES TO TELEPHONE NUMBERS ON THE FTC'S DO NOT CALL LIST. WE MAY THEN IMPOSE NETWORK-LEVEL CONSTRAINTS, WHICH CAN INCLUDE THROTTLING THE RATE AT WHICH THE CUSTOMER CAN INITIATE CALLS, RESTRICTING THE NUMBER OF CONCURRENT CALLS, AND LIMITING THE CALLER-ID VALUE(S) AVAILABLE FOR THE CUSTOMER'S USE. NEW AND EXISTING OVERSEAS CUSTOMERS MAY WARRANT APPROPRIATE SCRUTINY BEFORE CALLS ARE ALLOWED TO BE GENERATED.

CONTRACTUAL TERMINATION: IF A CUSTOMER FAILS TO MITIGATE THE ILLEGAL CALLS OR COOPERATE WITH CONTRACTUAL TRACEBACK COMMITMENTS, ATG MAY NOTIFY AN OFFENDING ORIGINATING PROVIDER OF TERMS-OF-SERVICE AND/OR ACCEPTABLE-USE-POLICY VIOLATIONS, THE TERMS OF WHICH GENERALLY PROHIBIT THE SENDING OF ILLEGAL CALLS, AND OFTEN HAVE EVEN MORE RIGOROUS RESTRICTIONS. IF THE TRAFFIC CONTINUES, THE ATG MAY ACT ACCORDING TO THE TERMS OF ITS CONTRACT WITH THE ORIGINATING PROVIDER.



TRACEBACK AND ENFORCEMENT

We respond to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and cooperate with such entities in investigating and stopping any illegal robocalls that use our service to originate calls. In order to accept a new interconnection, Advance Telecom Group. investigates about: Company's physical business location. Contact person(s). Company's reputation in the industry. We also ask the company for their incorporation letter so that it can be verified against the information they are sharing in the interconnection form and we reject all companies using generic domains as @gmail.com, @outlook.com, etc. This helps to identify, filter and, avoid interconnecting those companies that represent a high percentage of probability to send robocalls. Once the company is interconnected, we issue an official notification with the following information:

* We do not allow missed calls * Fraud, spam and scam traffic is not allowed * We will have to issue reports with your name and company name to the authorities in case we find any spam/scam traffic over our routes * is also considered as fraud and is not allowed on our routes.

Please be aware that, in case we find any of this traffic over the route, your account will be immediately suspended.

We have also implemented Inbound shield policies by querying local databases in the USA for verifying if the caller id is reported as high risk calling number or spoofed number (we carry out these queries using the Trans nexus Clearing platform).

in order to open a new company, we ask for the following details:

- FUS - 499 Filer ID#
- W9 - TIN#
- Robocall Mitigation Database (RM ID) #
- FCC Registration Number (FRN)#
- Traffic profile description
- Legal company name
- Legal address of the company
- Web Page
- LinkedIn profile

The company is fully investigated by our legal team, taking into account all the above details plus the company's creation year in order to assign a trustability percentage. Once the company is interconnected, we share the following information:



1. ANIs must be legitimate, conforming, US ANIs, meaning + 1NPANXXXXY.
2. The ANI must conform to the LERG (reference NPA-NXXes in the LERG 6 file)
The ANI cannot, under any circumstances, be text (e.g. asterisk)
3. The ANI must not be spoofed, in other words, we must be able to return a call to the ANI and get something other than a recording.
4. Calls to a DNIS on the National DNC may be subject to penalties.
5. Calls originating from bona fide US government ANIs, such as the Social Security Administration, may be subject to fines or even imprisonment and therefore, are not accepted.

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