

Robocall Mitigation Program Description for The Sprout Network LLC DBA Telepyx LLC(Attestation Provided by Vitelity)

1. Introduction: The Sprout Network LLC DBA Telepyx LLC is committed to ensuring that its network remains free from illegal robocalls, which can cause significant harm to consumers and disrupt the integrity of telecommunications. In partnership with Vitelity, which provides attestation services, The Sprout Network LLC DBA Telepyx LLC has developed a comprehensive Robocall Mitigation Program aimed at eliminating robocalls and complying with federal regulations such as the TRACED Act. The program focuses on transparent practices, advanced technologies, and industry collaboration to protect customers and end users from the detrimental effects of robocalls and caller ID spoofing.

2. Objectives: The key objectives of Sprout Network LLC's Robocall Mitigation Program are:

- To eliminate illegal robocalls originating from or terminating on the The Sprout Network LLC DBA Telepyx LLC platform.
- To meet all regulatory requirements, including those set forth by the Federal Communications Commission (FCC) and the TRACED Act, through collaboration with Vitelity for call authentication attestation.
- To provide a transparent, secure, and fraud-free communication experience for its resellers and their end users.
- To adopt industry best practices for robocall mitigation and continuously evolve the program based on emerging threats and technologies.

3. Compliance with TRACED Act and FCC Regulations: The Sprout Network LLC DBA Telepyx LLC is fully compliant with the requirements of the TRACED Act and FCC regulations, which are designed to combat robocalls and caller ID spoofing. The company ensures compliance through the following practices:

- **Robocall Mitigation Certification:** The Sprout Network LLC DBA Telepyx LLC files an annual **Robocall Mitigation Certification** with its upstream providers and regulators, documenting its ongoing efforts to reduce robocalls and combat fraud.
- **Collaboration with Vitelity for Attestation:** Through its partnership with Vitelity, The Sprout Network LLC DBA Telepyx LLC leverages **call authentication attestation** to meet FCC regulations. Vitelity provides the attestation necessary to verify and authenticate all calls, ensuring that calls originating from The Sprout Network LLC's network are legitimate and conform to the TRACED Act standards.

4. Attestation Process Provided by Vitelity: The attestation process, provided by Vitelity, is a critical component of Sprout Network LLC's Robocall Mitigation Program. Vitelity helps verify the identity of the calling party through the **STIR/SHAKEN** framework and provides attestation levels to authenticate calls:

- **STIR/SHAKEN Framework:** Vitelity's STIR/SHAKEN technology ensures that each call is properly authenticated and verified. This framework uses digital signatures to

confirm that the calling number is valid and not spoofed, significantly reducing the risk of fraudulent robocalls.

- **Attestation Levels:**
 - **A-Level Attestation (Full Attestation):** If The Sprout Network LLC DBA Telepyx LLC is certain that the call is coming from a legitimate source, the call receives A-level attestation. This means the caller's identity has been fully verified, and the call is authentic.
 - **B-Level Attestation (Partial Attestation):** For calls where full verification cannot be confirmed, the call is given B-level attestation. This indicates that the call's authenticity is partially validated, but there may be uncertainties.
 - **C-Level Attestation (Failure to Authenticate):** If the call fails to meet any authentication criteria, it is assigned C-level attestation. These calls are considered unverified and could potentially be flagged or blocked to prevent robocall activity.

By using Vitelity's attestation services, The Sprout Network LLC DBA Telepyx LLC ensures that every call passing through its network is either fully authenticated or clearly flagged as suspicious, providing greater transparency and reducing the likelihood of fraudulent calls reaching end users.

5. Call Blocking and Filtering Solutions: The Sprout Network LLC DBA Telepyx LLC employs a combination of call-blocking and filtering techniques to prevent robocalls from being transmitted across its network:

- **Real-Time Call Monitoring:** The Sprout Network LLC DBA Telepyx LLC utilizes advanced real-time analytics to detect high-risk calls. Calls with unverified or low-level attestation are flagged and reviewed for potential fraud, with legitimate calls passed through the network.
- **Fraud Detection and Prevention:** The Sprout Network LLC DBA Telepyx LLC integrates automated fraud detection tools that analyze call data patterns and identify suspicious traffic. Calls showing signs of robocall behavior—such as rapid dialing or originating from untrusted sources—are blocked before reaching end users.
- **Collaboration with Vitelity and Industry Databases:** The Sprout Network LLC DBA Telepyx LLC works with Vitelity and industry databases to cross-reference phone numbers and call sources. This ensures that calls originating from known fraudulent numbers or locations are blocked across the network.

6. Monitoring and Reporting: To ensure the effectiveness of the Robocall Mitigation Program, The Sprout Network LLC DBA Telepyx LLC continuously monitors its network traffic and provides regular reporting:

- **Detailed Reporting on Attestation Levels:** The Sprout Network LLC DBA Telepyx LLC provides its resellers and customers with regular reports showing the distribution of call attestation levels (A, B, C) across the network. This allows transparency in the level of trust associated with the calls being transmitted.

- **Robocall Detection and Blocking Metrics:** The Sprout Network LLC DBA Telepyx LLC offers reports on the number of calls blocked or flagged as robocalls based on detection tools, attestation results, and fraud prevention systems. These reports help customers understand the success rate of the program and ensure ongoing improvements.
- **Call Volume and Trend Analysis:** The Sprout Network LLC DBA Telepyx LLC tracks trends in call volume and robocall patterns, providing actionable insights to its customers on how to improve their own robocall mitigation efforts.

7. Customer Education and Support: The Sprout Network LLC DBA Telepyx LLC recognizes that educating its resellers is key to successfully combating robocalls. To this end, the company provides the following resources:

- **Training Programs:** The Sprout Network LLC DBA Telepyx LLC offers training to its resellers and end users on how the Robocall Mitigation Program works, the importance of call authentication, and how to interpret attestation results.
- **Robocall Mitigation Best Practices:** Resellers are given clear guidelines on how to configure their systems to best take advantage of the available robocall mitigation tools, including call-blocking, attestation verification, and call filtering techniques.
- **Customer Support Team:** The Sprout Network LLC DBA Telepyx LLC provides ongoing support through a dedicated team that can assist resellers with any questions related to robocall mitigation. This support team helps with troubleshooting issues, resolving false positives, and ensuring smooth program implementation.

8. Collaboration with Vitelity: The Sprout Network LLC DBA Telepyx LLC works closely with Vitelity to leverage their expertise in call authentication and robocall mitigation:

- **Shared Responsibility for Compliance:** Vitelity's robust attestation services are integral to The Sprout Network LLC's efforts to comply with FCC regulations and reduce robocall traffic. Vitelity provides the technical infrastructure that enables accurate and efficient attestation, ensuring that all calls originating from The Sprout Network LLC's network are fully compliant.
- **Ongoing Improvement:** Vitelity is constantly upgrading its systems and technologies to stay ahead of new robocall tactics. The Sprout Network LLC DBA Telepyx LLC, in collaboration with Vitelity, continuously improves its Robocall Mitigation Program to meet evolving threats and regulatory changes.

9. Ongoing Evaluation and Program Enhancement: The Sprout Network LLC DBA Telepyx LLC is committed to continually refining its Robocall Mitigation Program:

- **Regular Assessments:** The program is evaluated regularly to ensure it is meeting objectives, improving call quality, and effectively mitigating robocalls.
- **Adaptation to Regulatory Changes:** As regulations evolve, particularly in response to new robocall tactics or emerging threats, The Sprout Network LLC DBA Telepyx LLC adapts its program to ensure ongoing compliance.

- **Customer Feedback:** The Sprout Network LLC DBA Telepyx LLC values input from resellers and end users, using their feedback to identify areas for improvement in the robocall mitigation process and to refine its call authentication techniques.

10. Conclusion: Sprout Network LLC's Robocall Mitigation Program, in collaboration with Vitelity's attestation services, provides a robust framework to eliminate robocalls and protect the integrity of the telecommunications network. By leveraging STIR/SHAKEN technology, call authentication attestation, and advanced call-blocking techniques, The Sprout Network LLC DBA Telepyx LLC ensures that its customers and their end users are shielded from fraudulent robocalls. This proactive approach to robocall mitigation not only ensures compliance with federal regulations but also creates a safer, more reliable communication environment for all users.