



Robocall Mitigation Plan

Evolocity Networks, LLC (the “Company”) is committed to cooperating with the Federal Communications Commission (FCC), law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that it learns are using our service to originate calls or transit calls into the United States and territories.

The Company has fully implemented STIR/SHAKEN.

1. CONTRACT REQUIREMENT: Our agreements clearly prohibit passing illegal robocalls through any of our switches or networks and define precise requirements for ASR, LCD and other traffic statistics. Customers who violate these rules are subject to immediate termination without notification. If The Company believes illegal traffic has been passed through its network, the customer sending such traffic forfeits confidentiality and all data will be shared with industry partners and law enforcement as required by regulatory bodies.

2. MONITORING AND TRACEBACK: The Company commits to fully responding within 24 hours to all traceback requests from the ITG, the TPTG, the FCC, and law enforcement. The Company shall cooperate with these groups to investigate and stop any illegal robocallers from using Company’s service to carry or process illegal calls. When notified by the FCC’s Enforcement Bureau, Company shall block and report identified illegal traffic, and any substantially similar traffic, on an ongoing basis (unless Company’s investigation determines that the traffic is not illegal) when Company receives actual written notice of such traffic from the Enforcement Bureau. If Company determines that the identified traffic is not illegal, Company shall provide the Enforcement Bureau with an explanation as to why Company reasonably concluded that the identified traffic is not illegal, and what steps it took to reach that conclusion.

The Company utilizes a combination of internal tools and upstream provider solutions to check for Do Not Originate (DNO) numbers as well as invalid phone number formats, area codes and unassigned number blocks. These tools include but are not limited to: Controls and Alerts provided by the Upstream Provider’s internal mitigation and protection system, regular review of call records for suspicious activity, platform controls to restrict known fraudulent originations and destinations, limits on the number of concurrent call paths a customer may initiate. The Company also utilizes manual data analytics to detect and investigate irregular and unexpected calling patterns, originating number use against customer profiles by performing the following activities: Regular review of the network to identify suspicious traffic patterns, limiting customers’ capacity via calls per second and/or concurrent session limits, and regularly checking call patterns for possible abusive traffic.

3. Know Your Customer (KYC) requirement: The Company’s KYC process consists of a strict vetting process before a customer is accepted onto the Company’s network. All new customers are in both contacted in both verbal and written form by the Company President prior to being accepted onto the Company’s network. New customers’ name, address, and business activity are all vetted by manual processes including: phone calls to customer, on-site visits, online investigation of business’s presence

and activity. Subsequent communications are maintained on a regular basis via text messaging, email messages, personal phone calls, and on-site visits.

4. Upstream Providers: The Company has two upstream providers from which it receives voice traffic:

1. PayG LLC dba SkySwitch

Arborcrest 1, 751 Arbor Way

Suite 150

Blue Bell, PA 19422

Phone: 747.777.8100

Email: support@skyswitch.com

2. CoreDial LLC

Arborcrest 1, 751 Arbor Way

Suite 150

Blue Bell, PA 19422

Phone: 215.297.4400

Email: cdsupport@skyswitch.com

5. RIGHT OF REFUSAL: The Company reserves the right to refuse traffic from any party at any time where robocalling or use of originating numbers that are not valid or they are not authorized to use has occurred or is suspected. The Company is able to block the originating number(s), terminating numbers(s), trunk(s) or customer, including termination of customer relationship to prevent robocalling, invalid originating number or spoofed origination number transiting the Company's networks.