



Robocall Mitigation Plan

Pinnacle Communications Corp. (Pinnacle)

d/b/a SIP 360

19821 Executive Park Circle

Germantown, MD 20874

Richard Simmons

Vice President

240-912-2522

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Overview

Pinnacle Communications (Pinnacle) is a provider of end-user equipment to the hospitality (hotel) industry. Pinnacle does not own or operate any of its own switching equipment and has less than 100,000 lines of service. All telecom processing is done through our contracted Upstream Providers.

Call analytics & Network Monitoring

Through Pinnacle's billing and rating partnership with SmartBilling, Call analytics are monitored and flagged when telecom calls exceed established criteria. SmartBilling immediately notifies Pinnacle of repeated call generation, short and excessive duration call patterns, and other factors which could indicate Robocall attempts. Our upstream providers are also interconnected with SmartBilling and provide temporary call restrictions to the end-user until anomalies are investigated.

Service Establishment - Know Your Customer

Pinnacle Communications is primarily a provider of domestic voice services to hospitality (hotel) clients. All new business customers must meet the requirements of Pinnacle's onboarding agreements. These agreements collect detailed background information about each customer. The information required is kept in permanent record and is as follows:

- Customer Name, DBA/Other Trade Names, Holding Company

19821 Executive Park Circle, Germantown, MD 20874

Phone (301) 601-0777 • Fax (301) 601-9322 • www.pinnaclecommunications.com

- Type of Entity (Corporation, Individual, Partnership, LLC, etc.)
- Website URL
- State of incorporation
- FEIN number
- Key Personnel Contact Information (Main, Legal, Billing, Technical)
- Payment Remittance Entity Name/Bank Name
- Officers/Owners/Principals – Contact Information and Ownership percentage
- Contact Information and a minimum of 3 Trade and Bank References

Service operation – Know Your Upstream Providers

Pinnacle Communications is contracted with two different upstream providers that all call routing is directed towards. All outgoing and incoming services are handled by these carriers:

1. Septrivium, Inc.
d/b/a GrayMatter Networks
228 East Route 59 – Suite 146
Nanuet, NY 10954
David Maayani, CEO
david@graymatternetworks.com
2. Clearly IP Inc.
3255 W. Highview Dr.
Appleton, WI 54914
Anthony Lewis, CEO
920-383-3100
carriers@clearlyip.com

Plan Specifics:

Any suspected robocalls can be reported to Pinnacle's Regulatory and Compliance point-of-contact via email at rsimmons@pinn360.com or (240) 912-2522. These complaints can be made at any time 24/7/365 but will be investigated Monday-Friday between 9 and 5 Eastern time. Complaints should include the number called from, the number dialed, the date and time the call was received. Pinnacle will review call logs from that period and determine if further action or traceback is required.

Pinnacle Communications' customers must agree not to use the company's services for, among other things, unlawful, harassing, or fraudulent purposes. Pinnacle has the right to

discontinue service to any customer that does not comply with the acceptable use policy. Pinnacle would immediately terminate service to any customer found to be engaging in illegal robocalling activities.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Richard Simmons". The signature is fluid and cursive, with a large initial "R" and "S".

Richard Simmons
Vice President
Pinnacle Communications