



ROBOCALL MITIGATION PROGRAM DESCRIPTION

DESPITE THE FACT THAT WE (TELEPHONE INDUSTRIES):

1. Do not operate a network.
2. We are simply a sales agent for Bandwidth, Inc. who operates "the network" for our end-users.
3. Calls originate on the Bandwidth, Inc. network.
4. We assume that Bandwidth, Inc. has implemented the STIR/SHAKEN authentication framework required by FCC.

We hereby submit this Robocall Mitigation Program Description pursuant to the provisions of 47 C.F.R. § 64.6305, adopted by the Federal Communications Commission (FCC) which require all "voice service providers" to establish a "robocall mitigation plan". This document sets forth Telephone Industries' current policies and procedures designed to reduce or eliminate outbound illegal robocalls originating from our customers, over the network of our wholesaler (Bandwidth, Inc.) It is our opinion that these policies and procedures represent the entirety of the "reasonable steps" that can be taken, from our relatively small position in the chain.

CUSTOMER VETTING

Note that "customers" of Telephone Industries, for the purpose of this document, are end-users whose voice services are facilitated by Bandwidth, Inc. SIP trunks. As stated above, Telephone Industries is simply a sales agent for Bandwidth, Inc.

Telephone Industries has always investigated all POTENTIAL customers as to the type of business and the legitimacy of that business as a means to make sure that those potential customers would pay their bills or otherwise create an inordinate financial or resources burden upon becoming a customer. These existing vetting processes will now include the evaluation of a potential customer as a robocall/spam risk. Any potential customer who is identified as a robocall/spam risk will be investigated further and may, as a result, be rejected by Telephone Industries.

With regard to EXISTING customers, Telephone Industries has always audited the number of calls and number of minutes used by all customers every month. And significant increase in the number of calls or number of minutes would be cause for further investigation. Furthermore, Telephone Industries audits the PHONE NUMBERS in use by customers on a monthly basis. In addition to the cost considerations of additional TELEPHONE NUMBERS for a particular customer, requests for additional TELEPHONE NUMBERS are evaluated from the perspective of robocall/spam risk mitigation.

ROBOCALL/SPAM CALL GENERAL AWARENESS

The ownership, management, and staff (ALL personnel) associated with Telephone Industries are committed to maintaining an as-thorough-as-reasonably-possible knowledge of the telecommunications industry, including nasty bits like how/why/where robocall and spam operators might exist along with methods to thwart and/or dis-incentivize such operators. This knowledge may be acquired by attending industry seminars, reading industry publications, and discussing prevention practices with associates at other telecommunications industry companies.

COOPERATION WITH LAW ENFORCEMENT

In addition to the above policies and procedures, Telephone Industries hereby commits to responding in a timely fashion to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG), and to cooperate with such entities in investigating and stopping any illegal robocall or spam operators that may use the Bandwidth, Inc. network to originate calls. Any inquiries by law enforcement should be directed to:

Erik Kuli
Principal
Telephone Industries
1663 N Glassell St
Orange, CA 92867
714-921-3000 x200
erik@telephoneindustries.net

1663 N. GLASSELL STREET
ORANGE, CA 92867
714-921-3000
FAX 714-921-3100
www.telephoneindustries.net