

Policy for Voice Robocall Mitigation Plan

Traceback Cooperation

- Pharmetika will cooperate in traceback investigations. To allow for timely and comprehensive law enforcement efforts against illegal robocallers, Pharmetika will dedicate sufficient resources to provide prompt and complete responses to traceback requests from law enforcement. Pharmetika has identified a single point of contact in charge of responding to these traceback requests and will respond to traceback requests as soon as possible within 24 hours, excluding weekends and all major holidays.

- Pharmetika will require traceback cooperation. For all new and renegotiated subscribers, governing the transport of voice calls, our web policy will specify the use of 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 our own customer if the call originated in our network.

Subscriber Vetting Practices

- Residential and small business practices

- Pharmetika will vet residential and small businesses through normal business practices and will obtain billing address, primary residence, or business location.

- Commercial retail end-users

- Pharmetika will confirm the identity of 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 the customer's business.

- Pharmetika has call detail records to determine typical call volume and potential reasons for significant deviations from the typical call volume. Pharmetika will determine if there are legitimate reasons for any customer to be making a number of high volume, short duration calls. Pharmetika will contact any commercial business within 24 hours of such deviations to determine if call volumes are legitimate.

Telephone Number Validation Practices

- Telephone Number Validation is necessary and appropriate when an End-User's right-to-use the

telephone number is unknown to the VSP. Pharmetika will validate as necessary and appropriate.