



ITEL CORP. Robocall Mitigation Plan

There are a variety of mitigation techniques that ITEL Corp (ITEL) utilizes to mitigate or entirely prevent the transmission of illegal robocall traffic. An overview of these approaches is listed below.

Know Your Customer: ITEL CONFIRMS THE IDENTITY OF NEW 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 CUSTOMER'S BUSINESS. THIS CAN HELP PREVENT ORIGINATING PROVIDERS ALLOWING ILLEGAL CALLS FROM GAINING ACCESS TO VOICE

SERVICE PROVIDERS' NETWORKS.

MONITOR NETWORK TRAFFIC: ITEL ANALYZES HIGH-VOLUME VOICE NETWORK TRAFFIC TO IDENTIFY AND MONITOR PATTERNS CONSISTENT WITH ROBOCALLS. THIS INFORMATION CAN ASSIST IN THE TRACEBACK PROCESS TO IDENTIFY THE SOURCE OF ILLEGAL CALLS.

REQUIRE TRACEBACK COOPERATION IN CONTRACTS: ITEL FOR ALL NEW AND RENEGOTIATED CONTRACTS GOVERNING THE TRANSPORT OF VOICE CALLS, USE 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 ITS OWN CUSTOMER IF THE CALL ORIGINATED IN ITS NETWORK.

REJECTION BY THE ORIGINATING PROVIDER: WHEN ITEL LEARNS THAT THEIR PLATFORM IS BEING USED AS A CONDUIT FOR ILLEGAL ROBOCALLS, WE IDENTIFY THE OFFENDING CUSTOMER FROM THE CALL EXAMPLES PROVIDED BY THE RELEVANT PARTY (E.G., CALL SAMPLES PROVIDED TO THEM BY THE ITG), AND THEN EXAMINE ITS CALL DETAIL RECORDS (CDRs) FOR THAT PARTICULAR CUSTOMER. ITEL EXAMINES THE CDRs FOR TELLTALE SIGNS OF ILLEGAL ROBOCALL TRAFFIC, SUCH AS HIGH CALL VOLUMES, LOW DURATION CALLS, SEQUENTIAL DIALING PATTERNS, AND CALL VOLUMES TO TELEPHONE NUMBERS ON THE FTC'S DO NOT CALL LIST. WE MAY THEN IMPOSE NETWORK-LEVEL CONSTRAINTS, WHICH CAN INCLUDE THROTTLING THE RATE AT WHICH THE CUSTOMER CAN INITIATE CALLS, RESTRICTING THE NUMBER OF CONCURRENT CALLS, AND LIMITING THE CALLER-ID VALUE(S) AVAILABLE FOR THE CUSTOMER'S USE. NEW AND EXISTING OVERSEAS CUSTOMERS MAY WARRANT APPROPRIATE SCRUTINY BEFORE CALLS ARE ALLOWED TO BE GENERATED.

CONTRACTUAL TERMINATION: IF A CUSTOMER FAILS TO MITIGATE THE ILLEGAL CALLS OR COOPERATE WITH CONTRACTUAL TRACEBACK COMMITMENTS, ITEL MAY NOTIFY AN OFFENDING ORIGINATING PROVIDER OF TERMS- OF-SERVICE AND/OR ACCEPTABLE-USE-POLICY VIOLATIONS, THE TERMS OF WHICH GENERALLY PROHIBIT THE SENDING OF ILLEGAL CALLS, AND OFTEN HAVE EVEN MORE RIGOROUS RESTRICTIONS. IF THE TRAFFIC CONTINUES, THE ITEL MAY ACT ACCORDING TO THE TERMS OF ITS CONTRACT WITH THE ORIGINATING PROVIDER.

Know Your Customer

ITEL UTILIZES THE MITIGATION TECHNIQUE OF "KNOW YOUR CUSTOMER." ITEL IS A LONG-ESTABLISHED PROVIDER THAT MAINTAINS A CLOSE RELATIONSHIP WITH ITS SUBSCRIBERS. ITS CUSTOMERS ARE GENERALLY "MOM AND POP" USERS AND FEW OF ITS TOTAL CUSTOMER BASE HAVE ENOUGH CALL PATHS TO GENERATE THE HIGH VOLUME OF TRAFFIC ASSOCIATED WITH ROBOCALLING ALLOWING US TO USE TARGETED IN-HOUSE ANALYTICS TO MONITOR, ALERT AND APPREHEND SUSPECTED ROBOCALLING ACTIVITIES.

ITEL HAS SET A CALL PATH LEVEL BASED ON ITS AVERAGE CUSTOMER SIZE. THE LEVEL – REFERRED TO AS “LARGE VOLUME CALLING CAPABILITY” – IS SUBJECT TO CHANGE.

ITEL HAS A SCREENING FOR NEW CUSTOMERS REQUESTING SERVICE AT OR ABOVE LARGE VOLUME CALLING CAPABILITY LEVELS:

- ● WE WILL NOT DEPLOY LARGE VOLUME CALLING CAPABILITY AS A RESIDENTIAL SERVICE OR AT AN ADDRESS SHOWN IN THE COMPANY RECORDS AS BEING RESIDENTIAL
- ● BUSINESSES REQUESTING LARGE VOLUME CALLING CAPABILITY MUST PROVIDE A TAX ID AND VERIFICATION AS TO THE NATURE OF THE BUSINESS
- ● WE VERIFY ADDRESSES TO LOOK FOR OVERLAPPING / MULTIPLE DEPLOYED VOICE PATH SUBSCRIPTIONS
- ● AN ITEL REPRESENTATIVE MAY MAKE INQUIRIES AND INVESTIGATE THE BUSINESS TO VERIFY THE NUMBER OF USERS AT THE LOCATION IS APPROPRIATE FOR THE VOLUME OF CALLING

ITEL SERVES A NUMBER OF LONG-TIME BUSINESS END USERS WITH LARGE VOLUME CALLING CAPABILITY THAT ARE BEING DIRECTLY CONTACTED TO REVIEW WITH THEM ITEL’S POLICIES AND EFFORTS TO PREVENT THE ITEL NETWORK FROM BEING USED FOR ILLEGAL ROBOCALLING.

IV. Network Monitoring

ITEL IS CHECKING TO PROCES THE IMPLEMENTATION A SOFTWARE THAT ALLOWS FOR REAL-TIME MONITORING OF TRAFFIC AND WILL FLAG CALL PATTERNS INDICATIVE OF POTENTIAL ILLEGAL ROBOCALLING.

V. Traceback and Enforcement Cooperation

ITEL WILL ACTIVELY COOPERATE WITH THE TRACEBACK COMMUNITY INCLUDING THE FCC, LAW ENFORCEMENT, AND THE INDUSTRY TRACEBACK GROUP (ITG) TO INVESTIGATE AND STOP ILLEGAL ROBOCALLS. ITEL WILL DEDICATE SUFFICIENT RESOURCES TO PROVIDE PROMPT AND COMPLETE RESPONSES TO TRACEBACK REQUESTS.