



Cloud Technologies, Inc.
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Robocall Mitigation Plan

This Robocall Mitigation Plan ("RMP") is submitted by Cloud Technologies, Inc pursuant to the provisions of 47 CFR § 64.6305. adopted by the Federal Communications Commission (FCC). This document sets forth our current policies and procedures designed to reduce or eliminate outbound illegal robocalls originating from our network. All calls originating from our network are subject to this RMP

Know Your Customer

We follow the best practices for vetting caller identity described in NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

Cloud Technologies, Inc. ("Cloud") currently has agreements on file with each of its customers, which includes Company Name, services address(es), Email, contact telephone number, all telephone numbers to be utilized, and the signature of an officer of the company. Each customer must agree to adhere to Cloud's acceptable use policy and RMP. Customers may only utilize caller ID numbers and identifiers for number(s) that they own and control on our network. Cloud will only provide services to our customer once the telephone numbers are activated in our call management systems, have been ported into our Underlying Provider, and have been added to the customer's phone system. Cloud does not permit the use of illegal robo-dialers, caller ID spoofing or any use that violates the Telephone Consumer Protection Act ("TCPA"), the Truth in Caller ID Act or FCC rules. All caller ID information is managed by Cloud and cannot be manipulated by the customer without our knowledge.

Telephone Number Validation

Customers may port TNs into our Underlying Provider's network via the Local Number Portability process. The porting is managed by our Underlying Provider to port out the numbers from the customer's losing carrier, into our Underlying Provider's network. Our customer must provide proof of control of any phone number being ported, by way of a signed Letter of Authority ("LOA") validated by the losing carrier based on current account number, service address and authorized account contact.

Know Your Underlying Provider

Our Underlying Provider ("Underlying Provider") is Lumen/Level 3 Communications. We have contractual agreements in place with them to provide SIP Trunks. Cloud receives all ANIs from our Underlying Provider and does not pass any other ANIs to our Underlying Provider. Our Underlying Provider has implemented STIR/SHAKEN and signs all calls originating from their network.

Traceback Requests

Cloud responds, within 24 hours, to all traceback requests from the Commission, law enforcement, and the registered traceback consortium, as well as cooperates with such entities in investigating and stopping any illegal Robo-callers that use our Voice service to originate calls.

Enforcement

Company has not, at any time in the prior two years, been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or



suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

The Company has not been prohibited by the Commission from filing in the Robocall Mitigation Database.

Monitoring

Monitoring of the network is done at our Underlying Provider's network to monitor metrics, failures, quantities, calls per second, and other metrics to detect robocalling behavior.

Blocking

Cloud monitors detailed call logs, and also has Underlying Provider support to investigate further with tracebacks. If it is determined that a caller was attempting to originate unlawful, or illegal Robocalls, Cloud will take action to stop the offending practice by immediately suspending the customer's service until they are within compliance, or as needed, terminate the service as appropriate.