

DESCRIPTION OF ROBOCALL MITIGATION PROGRAM

Twin City Capital, L.L.C. d/b/a Small Business America d/b/a American Select (“TCC”) hereby submits this Description of Robocall Mitigation Program to the Robocall Mitigation Database describing and confirming the following:

(1) TCC’s specific reasonable steps to avoid originating illegal robocall traffic as part of this Robocall Mitigation Program;

(2) TCC’s intent to participate as a member of a working group, industry standards group, or consortium working to develop a non-internet Protocol caller identification authentication solution; and,

(3) TCC’s commitment to respond fully and timely to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers using TCC’s service to originate calls.

I. EFFORTS TO AVOID ORIGINATING ILLEGAL ROBOCALLS AS PART OF THE ROBOCALL MITIGATION PROGRAM

TCC includes meaningful investments in new features within the budget to combat illegal robocalls as part of its Robocall Mitigation Program. TCC considers the benefit of deploying systems to detect potential robocall activity relying upon statistics such as average call duration, Answer Seize Ratio (“ASR”), and call count carrier/consumer reports. As part of TCC’s Robocall Mitigation Program, TCC provides the following solutions to help minimize the impact of illegal or unwanted robocalls on customers:

- **Automatic Number Identification Management:** TCC seeks to identify and block originating telephone numbers deemed abusive based upon patterns of activity.
- **Proactive Blocking.** Per rules adopted by the Commission in FCC 17-151, TCC requests underlying carriers to block calls from phone numbers on Do-Not-Originate lists from US Telecom and Neustar.

- **Training.** TCC periodically trains sales teams to refrain from selling TCC voice services to suspected high call volume and low call revenue profiles, or if customer uses automated dialing systems.
- **Terms and Conditions of Customer Agreements.** TCC's voice service terms and conditions prohibit customers from originating any calls using auto-dialer or other automated call generator, further providing TCC with the right to suspend service if TCC suspects or detects such calls originating from the customer.

Through reports generated by Call Detail Record and pattern trends, fraud information sharing through industry organizations, and third-party notifications and complaints, TCC may identify potential unlawful robocalling. In instances where TCC suspects or identifies unlawful calling, in addition to taking the steps identified above, TCC reserves the right to take any action it deems necessary to eliminate the fraudulent activity.

II. Know Your Customer Program

TCC maintains established and implemented comprehensive Know Your Customer ("KYC") policies for any new and existing customers. One objective of the KYC policy includes preventing TCC from being used, intentionally or unintentionally, for spoofed or illegal traffic. KYC procedures enable TCC to identify and understand customers, which in turn helps TCC manage unlawful traffic.

III. LEADERSHIP ON STIR/SHAKEN DEVELOPMENT AND IMPLEMENTATION

TCC intends to participate in working groups, industry standards' group, or consortium working to develop further caller identification authentication solutions.

IV. COMMITMENT TO RESPONDING TO TRACEBACK REQUESTS

TCC remains committed to responding fully and timely to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to co-operating with such entities in investigating and stopping any illegal robocallers using TCC service to originate calls. TCC will work with the FTC and state attorney general counsel to participate in traceback efforts, further demonstrating commitment to such important efforts.