



EMAT Solutions LLC Robocall Mitigation Plan

EMAT Solutions LLC (EMAT) employs a variety of mitigation techniques to prevent or reduce the transmission of illegal robocall traffic. Below is an overview of these approaches:

1. Know Your Customer (KYC)

EMAT verifies 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 the customer's business.

This process helps prevent unauthorized or illegal callers from gaining access to voice service providers' networks.

2. Monitoring Network Traffic

EMAT analyzes high-volume voice network traffic to identify and monitor patterns consistent with robocalls. This proactive monitoring supports traceback efforts by pinpointing the source of illegal calls.

3. Requiring Traceback Cooperation in Contracts

For all new and renegotiated contracts governing the transport of voice calls, EMAT makes best efforts to include provisions requiring cooperation in traceback investigations. This includes:

- Identifying the upstream provider from which a suspected illegal robocall entered its network, or
- Identifying its own customer if the call originated within EMAT's network.

4. Mitigation Actions Against Offending Providers

When EMAT discovers that its platform is being used for illegal robocalls, it identifies the offending customer through call examples provided by relevant parties (e.g., call samples from the Industry Traceback Group [ITG]). EMAT examines call detail records (CDRs) for signs of illegal robocall traffic, such as:

- High call volumes,
- Short call durations,



- Sequential dialing patterns, and
- Calls to numbers listed on the FTC's Do Not Call Registry.

Mitigation measures may include:

- Throttling the rate at which the customer can initiate calls,
- Restricting the number of concurrent calls, and
- Limiting available caller ID values for the customer.

Additional scrutiny is applied to new and existing overseas customers before allowing calls to be generated.

5. Contractual Termination for Noncompliance

If a customer fails to mitigate illegal calls or cooperate with contractual traceback commitments, EMAT may notify the originating provider of violations of the terms of service or acceptable use policies. These terms generally prohibit illegal call traffic. If violations persist, EMAT reserves the right to take appropriate action per the terms of its contract, including service termination.

Additional Measures

Know Your Customer

As a long-established provider, EMAT maintains close relationships with its customers, most of whom are small-scale users. This facilitates targeted monitoring and analytics to detect and prevent suspected robocalling activities.

EMAT defines "large-volume calling capability" levels based on its average customer profile. Screening for customers requesting service at or above these levels includes:

- Prohibiting deployment of large-volume calling capabilities to residential services or addresses listed as residential,
- Requiring businesses to provide a Federal Tax ID and verification of their business operations,
- Verifying addresses for overlapping or multiple deployed voice path subscriptions, and
- Investigating the number of users at the location to ensure consistency with the requested call volume.

Long-time business users with large-volume calling capabilities are directly contacted to review EMAT's policies and efforts to prevent misuse of its network for illegal robocalling.

6. Network Monitoring

EMAT is in the process of implementing software for real-time traffic monitoring. This system will flag call patterns indicative of potential illegal robocalling for further investigation.

7. Traceback and Enforcement Cooperation

EMAT is committed to cooperating with the traceback community, including the FCC, law enforcement, and the Industry Traceback Group (ITG). Sufficient resources are allocated to ensure prompt and complete responses to traceback requests, aiding investigations to stop illegal robocalls.

This comprehensive Robocall Mitigation Plan reflects EMAT Solutions LLC's commitment to combating illegal robocalls and ensuring compliance with FCC regulations.

Let me know if further refinements are needed!