



Robocall Mitigation Procedure:

VR Telecom is an international wholesale VoIP carrier which have implemented the following techniques to ensure robocall mitigation:

- ◆ Company's network will be able to pass STIR/SHAKEN tokens as they come, the company will not be modifying or changing the level of certification received.
- ◆ The company does not accept or trade any products that are catered to short duration traffic.
- ◆ Network wide ANI blacklist. All calls from these ANI's are blocked. Such blacklist is continually updated.
- ◆ Dynamic traffic analysis with the use of automatic alert system as preventive measure and active monitoring to detect large bursts of calls in a short time frame.
- ◆ NOC team continuously investigates any suspicious activity to determine if any customer is sending illegal calls.
- ◆ Call Detail Record analytic. Identifies patterns of low average call duration and/or low call completion ratios.
- ◆ Blocking of traffic with sequential dialing patterns.
- ◆ Limitation of CPS to avoid any unexpected suspicious and fraudulent traffic.
- ◆ Detection of calls with calling numbers that are invalid, unallocated, unassigned, or listed on Do Not Originate (DNO) registries.

The Company provides service to carrier customers and requires potential customers to complete a comprehensive Profile which includes their legal information, filer and exemption information, industry and financial references, as well as other pertinent data to verify that the carrier is a registered Intermediate Provider and in good standing and certified to provide telecommunication services. If the company finds that the client is violating the restrictions above and the customer fails to remediate and detail the case of said irregularities, the company will take action such as suspension or termination of interconnection.