

Autodial Telecommunication LLC - FCC Robocall Mitigation Plan

Autodial Telecommunication LLC is a small voice service provider as defined in 47 C.F.R. § 64.6304(a), and complies fully with all conditions set forth in the FCC's orders, rules, and policies regarding the implementation of the STIR/SHAKEN framework.

Autodial Telecommunication LLC is dedicated to stopping illegal calls from originating in our network and monitoring the calls coming into our network consistent with Federal Communications Commission ("FCC") regulations.

Autodial Telecommunication LLC has implemented fully the STIR/SHAKEN call authentication protocol in our VoIP network. We registered with NECA in 2023 and were issued OCN 677K and also registered with iconectiv for STI-PA. Finally we have a contract with Sansay, a Certified Authority to be able to provide tokens on our CDRs for call identification.

STIR/SHAKEN does not, however, cover the TDM portions of Autodial Telecommunication Company's network. Therefore, Autodial Telecommunication has also adopted the policies and procedures set forth in this document to comply with the FCC's anti-robocalling regulations. This document defines Autodial Telecommunication Company's Robocall Mitigation plan.

"Know Your Customer" ("KYC")

The accurate identification of a subscriber in the STIR/SHAKEN ecosystem is tied to a telephone number-based caller identity associated with that subscriber. A subscriber is an entity that has a business relationship with Autodial Telecommunication through which we transit, originate and/or terminate calls on behalf of the subscriber.

Autodial Telecommunication Company's KYC program requires a signed contract with our subscriber. Prior to signing a contract, Autodial Telecommunication confirms a subscriber's identity by vetting a subscriber directly or by using a third-party vetting service.

The vetting process includes collecting information such as:

- physical business location,
- contact person(s),
- state or country of incorporation,
- federal tax ID,
- nature of the customer's business.

Telephone Number Authorization

For the purposes of this plan, a Telephone Number (TN)-based caller identity is defined as the originating phone number included in call signaling used to identify the caller for call screening purposes

that is uniquely associated with a subscriber. A TN used for caller identity may or may not be associated with the subscriber's account with the responsible party.

A subscriber is permitted to use a TN as a caller identity if a TN is directly managed by Autodial Telecommunication Company and/or obtained by Autodial Telecommunication from one of Autodial Telecommunication Company's underlying carriers for use by the subscriber. In most cases, Autodial Telecommunication directly manages TNs used by its subscribers. Autodial Telecommunication tracks these numbers in its inventory system and monitors the assignment of these numbers. In these cases, TN validation is the inherent result of Autodial Telecommunication Company assignment of the TN to its subscriber.

When originating a call, Autodial Telecommunication checks the calling party number (also called the ANI) against Autodial Telecommunication Company's inventory and will not attest the call unless the calling party number is a TN that has been properly validated.

Monitoring

Autodial Telecommunication has monitoring and reporting systems in place to analyze high-volume voice network traffic to identify and monitor patterns consistent with Robocalls. Our monitoring systems alert on calling patterns with unusual spikes, traffic patterns, or attempted use of non-validated ANIs to detect patterns consistent with

illegal Robocalls and attempts at illegal call spoofing.

If Autodial Telecommunication detects a pattern consistent with illegal Robocalls, or we have reason to suspect illegal Robocalling or spoofing is taking place over our network, we will seek to identify the party that is using our network to originate, route, or terminate these calls and take appropriate action.

Taking appropriate action may include, but is not limited to, initiating a traceback investigation, verifying that the originating commercial customer owns or is authorized to use the Caller ID number, and suspending or terminating the party's ability to originate, route, or terminate calls on our network.

Investigation of Suspicious Activity and Traceback

Autodial Telecommunication follows USTelecom Industry Traceback Group ("ITG") recommended industry best practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, Autodial Telecommunication will dedicate sufficient resources to provide prompt and complete responses to traceback requests.

Autodial Telecommunication will investigate suspicious activity found by its monitoring systems or reported to Autodial Telecommunication by consumers or third parties. The investigation could potentially result in opening a traceback request or with Autodial Telecommunication contacting a subscriber to correct improper use of the platform, or, if the subscriber or subscriber's EndUser does not respond or comply, to block their use of the platform.

For all new and renegotiated Autodial Telecommunication contracts governing the transport of voice calls, Autodial Telecommunication intends to contractually require Autodial Telecommunication Company's subscribers to cooperate with in traceback investigations by identifying the upstream provider from which the suspected illegal Robocall entered our network.

Blocking

When it is administratively feasible, Autodial Telecommunication will implement Do Not Originate ("DNO") requests it receives from the ITG.

If Autodial Telecommunication Company's monitoring systems identify suspected Robocalling patterns that are confirmed with further investigation, Autodial Telecommunication will take appropriate action which may include suspending or terminating the subscriber's or End-User's use of Autodial Telecommunication Company's network.

Plan Updates

This plan and industry best practices must evolve to respond to the dynamic nature of mitigating illegal Robocalling. Autodial Telecommunication Company will monitor industry best practices and continuously improve our internal processes to ensure this plan and our systems adapt to this ever-changing issue.