

Robocall Mitigation Plan and Reasonable Steps

Our company, Brastel Co. Ltd., based in Japan provides telecommunication services to our retail and corporate customers based here.

Our customers can call to different destinations around the world using either our prepaid card or post-payment plan.

Reasonable Steps taken to Mitigate Robocalls

1) Know Your Customer (KYC)

Since last year our company started to conduct KYC.
(which is also being required by the Japan Ministry of Internal Affairs and Communications)

We started by requiring our customers to submit the necessary documents to be able to verify that they are the actual person especially if they are requesting for the local Japan numbers.

For customers ordering local Japan numbers online, aside from submitting the necessary documents we now also require them to conduct selfie (KYC) to verify their identification.

2) Call Analytics and Call Pattern

We are only a small scale company.

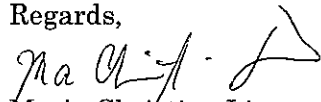
We do not have the high-grade call analytics software in our equipment.

Our NOC manually (visually) monitors if there is a sudden volume of traffic or any unusual traffic volume patterns.

We block those traffic at the same time inform the customer about the unusual traffic.

I hereby certify that the above measures being conducted to mitigate robocalls are true and correct to my knowledge.

Regards,



Maria Christina Lim

Carrier Operations Support

Brastel Co. Ltd.

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