

Clotech Telecommunications Limited Robocall Mitigation Plan

The following outlines and details Clotech Telecommunications Limited (“CLOTECH”) and the steps it has taken to avoid originating illegal robocall traffic as part of its robocall mitigation program:

- 1) Cooperation in Contracts: **CLOTECH** has made sure its contract is clear about the kind of traffic it will (and will not) accept from its customers. **CLOTECH** has notified them that if they do not follow the rules, they will be subject to prompt termination. If they are found sending calls that **CLOTECH** believe are illegal, they will forfeit confidentiality and their information will be shared with law enforcement and industry partners.
- 2) **CLOTECH** has made significant endeavors to know its customers and confirms 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 (if applicable), and the nature of customer’s business.
- 3) **CLOTECH** vets each customer as thoroughly as practical and possible. **CLOTECH** makes sure any suspicions are allayed before turning on service and does not give anonymous test accounts to auto-dialers.
- 4) **CLOTECH** takes quick action and follows a plan that allows it to act promptly and decisively on anything suspicious detected by its monitoring. If **CLOTECH** gets a traceback notice for an illegal robocall, it does not leave the issues unresolved but rather, **CLOTECH** insists on specific, deterministic explanations with explicit corrective actions from its customers. Fraud callers and customers with sloppy controls are not to be rewarded with on-going forgiveness.
- 5) **CLOTECH** publishes its policies to its customers and maintains a record of notifying its customer(s) of its policies regarding illegal robocalls and **CLOTECH's** intolerance of them.
- 6) **CLOTECH** takes especially cautious consideration of foreign sources sending auto-dialed traffic using USA +1 telephone numbers.
- 7) Beginning in June of 2023, **CLOTECH** will ensure that all customer(s) have registered with the Robocall Mitigation Database otherwise it will not accept their traffic.
- 8) **CLOTECH** performs Call Blocking destined to specified phone numbers as appropriate for robocall mitigation.
- 9) **CLOTECH** cooperates with investigative bodies and stands ready to comply with traceback requests

by law enforcement, the FCC, or the Industry Traceback Group, the official consortium designated to lead private traceback efforts. **CLOTECH** has also designated a single point of contact to handle traceback requests and coordinate with outside investigations.