

Robocall Mitigation Plan for Cetra Group Inc.

Overview

Cetra Group Inc. DBA Pacific Wave is committed to taking reasonable steps to avoid carrying illegal robocall traffic. Cetra Group Inc. is committed to adhering to all deadlines and requirements set forth by the Federal Communications Commission (FCC) in the TRACED Act. Cetra Group Inc. resells the underlying services of Skye Telecom LLC DBA Skyetel and does not own or operate facilities that would handle STIR/SHAKEN authentication and relies on Skyetel to perform that functionality.

Role in the Call Chain:

1. Cetra Group Inc. DBA Pacific Wave is a direct voice provider for enterprise customers, reseller of voice services, and is classified as a Non-Gateway Provider.

Screening

1. Cetra Group Inc. undertakes the following Know Your Customer (KYC) activities prior to providing voice services:
 - a. Information Gathering:
 - i. Company names, addresses, email addresses, verified phone numbers, valid payment information, FEIN, W-9, and legal entity with state and county information
 - b. Information Validation:
 - i. Enterprise Validation
 1. Verify company website is valid
 2. Perform Google search on enterprise and cross-reference address provided
 3. Validate if the company shows on social media like LinkedIn and Facebook
 - ii. Proof of Legal Business Entity:
 1. BREG DCCA - Department of Commerce and Consumer Affairs – Business Registration Verification
 - a. Verifying legal entity, business address
 2. Company Tax Number FEIN
 - iii. Proof of Authorized Individual
 1. Official documentation verifying that the individual acting on behalf of the company has the authority to do so
 2. Letter of authority on company letterhead, business card, suitable documentation
 - iv. Proof of government issued identification
 - c. Contractual Provisions:
 - i. Customers must agree to Cetra Group's terms of service that prohibit fraudulent traffic. Cetra Group Inc. reserves the right to suspend or terminate services for violating the acceptable use provisions. Customers may also be held liable for any financial penalties imposed on Cetra Group Inc. for fraudulent traffic sent from the customer.
 - d. Vetting Upstream Provider:
 - i. Procurement Process
 1. W-9
 2. Contact Person and verifying with company they are who they say are
 3. State or County of incorporation

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- 4. Federal tax Identification number
 - 5. Robocall Mitigation Database Filings and Compliance
- e. Preventing Calling Line ID Spoofing
 - i. Cetra Group Inc. does not assist or enable its customers to “spoof” telephone numbers on the services it provides. Spoofing is in violation of the Truth in Caller ID Act and violates Cetra Group’s terms of service and is grounds for suspension or termination of service.

2. Monitor

- a. Traffic Patterns and monitoring short duration calls, multiple calls to the same number within a minute, low call answer rates, calls to high fraud destinations, dialing patterns, calls to DNC Lists
- b. SPAM Call Filtering

3. Mitigation

- a. Commitment to Respond to Traceback Requests
 - i. Cetra Group Inc. commits to responding fully within 24-hours to traceback requests from law enforcement, the Federal Communications Commission, and the industry traceback consortium, and will cooperate with such entities in investigating and stopping any illegal robocalls that use its service to originate calls.
- b. Blocking/Discontinuance
 - i. If any fraudulent traffic is found or there is a high likelihood of being fraudulent, we will block any such traffic. In addition to blocking the fraudulent activity, Cetra Group Inc. may suspend or terminate the offending customer’s services.
- c. Selective Call Blocking
 - i. SPAM Call Filtering is also offered on incoming calls

This Robocall Mitigation Plan has been implemented and Cetra Group Inc. continues to evaluate the effectiveness of this plan and will take the appropriate steps to improve it when necessary.