

Time Clock Solutions, LLC
Robocall Mitigation Plan

Introduction

This document details the reasonable steps and actions taken by Time Clock Solutions, LLC (“Time Clock”) to mitigate and eliminate illegal robocalling. Time Clock has an ongoing commitment to scan for and help alleviate illegal robocalling by pre-qualifying prospective customers, monitoring existing customers for traffic patterns indicative of prohibited robocalls, and working with other providers and regulatory agencies in combatting fraudulent voice activity.

Time Clock provides competitive local exchange, Interexchange, and Voice over Internet Protocol (“VoIP”) calling services on a wholesale-only basis. All telecom services are provided on a resale-only basis. As a telecom reseller, Time Clock is dependent on our underlying provider’s assistance with monitoring their networks for fraudulent voice calling patterns.

Know Your Underlying Provider

Time Clock Solutions, LLC has master service agreements with our upstream providers and has received written assurances from their officials that it has and will continue to sign calls submitted to Time Clock Solutions, LLC and will abide by the FCC’s STIR/SHAKEN and robocall mitigation rules in all respects when providing voice services to Time Clock. Time Clock and its upstream providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Know Your Customer

Screening interviews are performed to understand potential customer business models and the potential, or lack thereof, for involvement in fraudulent robocalling schemes. Time Clock vets all our customers by performing multiple layers of validation including vetting the physical business location (firsthand), verifying contact person(s) for each location, validating business filings and fully understanding our customer's business. Voice services are a small part of the services we provide our customers, and we therefore have a thorough understanding of how they use all of our telecommunication systems. In addition, we build strong relationships with the senior management and/or executive management teams of our customers as a further step in maintaining the relationship.

In our research of the prospect, Time Clock will not activate clients that provide anonymous information or where data mismatches are found. Additionally, prospects are required to agree to Time Clock’s strict policies and contractual terms prohibiting the act of fraudulent voice activity as a condition of doing business with Time Clock. Individuals associated with prospects or current customers who have been known to act improperly or otherwise be involved in fraudulent robocalling will cause their companies to be rejected by Time Clock as a customer and any existing customer relationships could potentially be severed.

Traceback Requests

Time Clock is committed and will respond fully within 24 hours to all Traceback Requests from the FCC, law enforcement agencies, and the industry traceback consortium and vows to cooperate with these agencies in investigating and stopping any illegal robocallers that use our service to make calls. Time Clock will devote sufficient resources to provide prompt and complete information to traceback requests. Our points of contact to handle all traceback requests are:

Jacob Strong	Kristina Hite	Tomas Quintero
VOIP Engineer	Sr Manager Network Operations	VP Information Technology
419.966.2827	419.491.7754	727.276.5046
jstrong@velocitymsc.com	khite@velocitymsc.com	tquintero@velocitymsc.com

Upon calling our dedicated Traceback Department, Time Clock will perform searches utilizing Call Detail Records that will express which registration the call came in on as well as the IP of the call. We will be able to utilize these Call Detail Records to compare the suspected calls to the average traffic the customer's registration originates. We will use this information to determine if a sudden, suspicious spike in origination had occurred. If the traffic appears suspicious, we will contact the customer in question and request context regarding the suspected traffic. If the customer is unable to express a legitimate use-case for the suspected traffic, we will consider the traffic illegal. We will also work with customers to confirm they have equipment locked down to the best of their ability in case we can determine that the robocalls appear to be the result of a compromised system.

Telephone Numbers

A Telephone Number ("TN") based caller identity is the originating phone number included in call signaling used to identify the caller for screening purposes that is uniquely associated with the subscriber. A subscriber is permitted to use a TN as a caller identity if a TN is directly managed by Time Clock and/or obtained by Time Clock from Time Clock's underlying carrier for use by the subscriber. Numbers can also be allocated by Time Clock or ported using information from previous bill matching customer information.

Numbers used on our network are typically those that have been ported into the network from existing customer POTS lines. The validation of those numbers is confirmed via contractual obligations, letter of agency agreements, and confirmation of existing (losing) carrier billing. Furthermore, in many cases, we manually validate that each number ported does indeed ring to the specified customer location before porting the number into our network. In the event that a customer uses a telephone number for outbound purposes that is not on our network, the number(s) must be explicitly allowed by our platform after our team has confirmed, without a doubt, that the customer "owns" the telephone number.

International Calling

Time Clock is not currently an international voice services provider. If at any time Time Clock does decide to sell our services to international customers using North American Numbering Plan resources, we will familiarize ourselves with and develop best practices for full vetting of such customers and work with our underlying provider to perform the necessary telephone number validation on all international originated calls.

Call Analytics

The company utilizes a proprietary system that checks every outbound call to validate that the call is indeed from the proper customer. In addition, it examines historical call frequency for a rolling 30-day period against the recent call volume for the location to determine if there has been a spike in such call volume. If such as spike in call volume is detected, the system automatically blocks traffic from that customer location and alerts our voice operations team for further investigation. Furthermore, the company restricts the number of calls per hour from each customer location in accordance with their standard business practices as established during the vetting process.

Ongoing Robocall Mitigation

Time Clock monitors and examines call detail records (CDRs) on a repeating basis to detect suspicious call activity and/or calling patterns. When we and/or our underlying provider detect network usage patterns consistent with illegal robocalls or suspect illegal robocalling is taking place, we will immediately seek to identify the party that is originating, terminating, or routing these calls so that we may take appropriate action. The actions taken may include, but are not limited to initiating a traceback investigation; verifying that the originating customer owns or is authorized to use the Caller ID number; determining whether the Caller ID name sent to a receiving party matches the customer's corporate and/or d/b/a name; block the party's ability to originate, terminate, or route calls on the network; and/or providing notice to law enforcement authorities.

Our standard policy is to block then investigate. The first step beyond blocking is working to determine if the call traffic is legitimate or the result of a compromised customer system. If we have reasonable belief that the customer's equipment is compromised, we will work with the customer to validate that the system security is restored before re-enabling traffic. If the traffic is determined not to be the result of a compromised system, we inform the customer that such use of our services is prohibited and, if necessary, terminate those services with the customer.

Time Clock Contact for Robocall Mitigation-Related Issues

The Company will update our Robocall Mitigation filings within 10 business days of any change to the information outlined in this plan. Please direct any questions related to Robocall Mitigation issues to:

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