



To: Pop America LLC (dba apptelx) - Domestic Team

February 26, 2024

## Re: Carrier Traffic Fraud and Robocall Mitigation Procedure

### Purpose:

- Catalogue carrier partners efforts to mitigate fraud.
- Take necessary action to reduce incidents.
- Enforce all customers to sign an attestation for robocalling and AI generated calls.

### Main Steps:

- Require all upstream carriers to complete a Know Your Customer application, provide three USA trade references that they are currently doing business with a photo ID, Articles of Incorporation, a copy of their robodialer mitigation plan and a copy of their KYC application.
- KYC team conducts a review of the KYC application and supporting documents including requesting trade references that were listed on the KYC to provide their experience with the client including requesting the upstream client's traceback, spoofing or fraud incidents in order to approve or deny the request for interconnection.
- Have the customer sign the attestation for robocalling and AI generated calls. (attached to this procedure)
- Conduct verbal exploratory phone calls or Zoom video calls with any potential new interconnect candidates in order to ask direct questions about the nature of the company including the owners, what type of clients they have and what voice services they provide along with discussing their KYC application and robodialer mitigation processes.
- Cooperate with the US Telecom Group and provide a response to any traceback ID within no more than a 24 hour time frame.
- Track Traceback Requests for each carrier partner with a three-strike policy.
- Confirm upstream Media Ip(s) and make a decision based on IP owner and location if the media IP will be blocked from apptelx's overall network.
  - On Strike 1:
    - Notify the customer about the incident. Confirm the customer's upstream carrier has a 499 FILER ID and FCC Registration Number (FRN) along with requesting proper action be taken against the upstream carrier in response to the traceback.
  - On Strike 2:
    - Notify the customer about the incident. Confirm the customer's upstream carrier has a 499 FILER ID and FCC Registration Number (FRN) along with requesting proper action be taken against the upstream carrier in response to the 2nd traceback.
    - Reach out to our Sales Rep with a separate email and notify them of the 2nd strike.

Version: 3.8

Effective Date: 15 of February 2024

Pop America dba apptelx 867 Boylston Street 5th Floor, Suite#1704 Boston, MA 02116



- Request customer's Rabo-call/Fraud mitigation procedures for apptelx.
- Review and if applicable, make recommended adjustments to customer's Mitigation processes.
- On Strike 3:
  - If no procedures are presented - suspend the work with the customer until resolution is provided.
  - Contact Executive level representation at customer site via written notice: The notice will require a response from the customer that includes both an explanation of the incident(s) and written documentation of the process to cure.
  - Customer reviewed for removal from network by the Fraud Prevention Team at apptelx who meets weekly or as often as an incident(s) requires.
- **Strike Policy** - Any client who acquires a "strike" remains under review and in process until they have gone 60 days without an incident. A customer who has provided the requested documentation AND has gone 60+ days without incident is then released from the mitigation process until such time another incident is reported.



**Re: Attestation to be signed by each customer**

This attestation is made between, "Customer", as named in the signature section of this agreement, and successors and assigns, and Pop America LLC, dba apptelx, herein referred to as "apptelx", and its subsidiaries, divisions, and affiliates.

apptelx is fully committed to supporting the efforts of regulatory bodies such as the FCC, FTC, industry associations, and state attorneys general in upholding the integrity of voice and messaging communications. Practices such as illegal robocalling, unsolicited communications, deceptive campaigns, AI-generated or prerecorded messages, and all forms of spam undermine public trust in the communication ecosystem and pose significant threats to our industry's sustainability.

As a valued customer of apptelx, we trust that you share our commitment to combatting these harmful practices. It is imperative that we work together to address these challenges effectively. Therefore, we kindly request your affirmation of the following:

1. Customer agrees to remain informed about all regulations pertaining to illegal robocalling/robomessaging, unsolicited communications, and the usage of AI-based or prerecorded messages, including but not limited to directives issued by the FCC, FTC, and other relevant federal, state, and local authorities.
2. Customer agrees to actively monitor and take decisive action to prevent illegal robocalling/robomessaging, unsolicited communications, and deceptive campaigns, including those employing AI-generated deepfake prerecorded messages.
3. Customer agrees to promptly report any instances of illegal robocalling/robomessaging, unsolicited communications, or deceptive campaigns observed on the apptelx network.

By signing below, you acknowledge your commitment to the aforementioned actions and affirm that you are equally dedicated to protecting our shared networks from illegal and unwanted traffic.

Company Name: \_\_\_\_\_

Authorized Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

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