

Communication and Telephone Systems Robocall Mitigation Plan

Our system solutions and software monitors our outbound voice traffic in real time to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts us if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, or is in the FCC consumer complaint database. We immediately investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If we determine that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as appropriate.

Here's the procedure with steps for clarity and structure:

- Use the system solutions and software to continuously monitor all outbound voice traffic in real-time.
- Detect potential illegal robocalls based on preset criteria.
- Generate detailed reports that identify suspected illegal robocalls.
- Cross-reference calling numbers against the FCC consumer complaint database and the Do Not Originate list.
- Automatically generate alerts when any of the following conditions are detected:
 - The calling number is invalid or unallocated.
 - The calling number is listed on a Do Not Originate list.
 - The calling number matches entries in the FCC consumer complaint database.
- Initiate an immediate investigation into any call flagged by the system.
- Determine whether the caller was attempting to originate unlawful robocalls.
- Regularly review the system and reporting criteria to ensure compliance with the latest FCC regulations.

Know Your Customer

Communication and Telephone Systems Co, we follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group including but not limited to subscriber vetting and outgoing caller identity validation.

Traceback

We make it a priority to respond promptly and thoroughly to all traceback requests submitted by the Commission, law enforcement authorities, and the registered traceback consortium. Our team works closely with these entities to facilitate their efforts in identifying the sources of illegal

robocalls. We provide any necessary information or assistance required to trace the origin of such calls and ensure full cooperation throughout the investigation process. Additionally, we take proactive measures to support these investigations by addressing any instances where our services may have been used to originate unlawful robocalls. Our commitment to transparency and collaboration is central to our efforts to help combat illegal robocalling activities and protect consumers.

STIR/SHAKEN Implementation

Complete STIR/SHAKEN Implementation. Our network fully implements a robust robocall mitigation program in accordance with 47 CFR § 64.6305(b). This program encompasses stringent measures to prevent the transmission or processing of illegal robocall traffic. It includes a firm commitment to take reasonable steps to identify and block such calls, ensuring compliance with regulatory standards.