

**12-12-2024**

**Comtech Phones Corporation Robocall Mitigation Compliance with TRACED Act**

Comtech Phones Corporation (the “Company”) is committed to cooperating with the Federal Communications Commission (FCC), law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that it learns are using our service to originate calls or transit calls into the United States and territories.

Comtech Phones Corporation is a Non-Gateway Intermediate Provider without a Stir/Shaken obligation. Comtech Phones Corporation has two upstream providers from which it receives voice traffic:

1. PayG LLC dba SkySwitch Arborcrest 1, 751 Arbor Way Suite 150 Blue Bell, PA 19422  
Phone: 747.777.8100 Email: support@skyswitch.com

2. CoreDial LLC Arborcrest 1, 751 Arbor Way Suite 150 Blue Bell, PA 19422 Phone:  
215.297.4400 Email: cdsupport@skyswitch.com

BCM One, Inc., the voice service provider, and its affiliated entities as listed in the Appendix (the “Voice Service Provider Company”), submit their robocall mitigation certification and attached Robocall Mitigation Plan pursuant to Section 64.6305 of the FCC’s rules. The Voice Service Provider Company has taken specific reasonable steps, as set forth below, to avoid originating and processing illegal robocall traffic.

**MITIGATION PROGRAM**

The Voice Service Provider Company utilizes a combination of internal tools and trusted third parties (e.g., other peer service providers, end user complaints). In coordination with the ITG, Company performs Do Not Originate (“DNO”) based upon a reasonable DNO list, which may include blocking of government and other impersonation calls. The Company updates its tools to keep ahead of and detect invalid phone number formats, area codes and unassigned number blocks. The Company also utilizes internal data analytics to detect and investigate irregular and unexpected calling patterns, originating number use against customer profiles.

The Voice Service Provider Company uses data systems for analytics to identify illegal robocalling in addition to the Know Your Customer (KYC) requirements. The process includes:

- Monitoring the network to identify suspicious traffic patterns.
- Limiting customers' capacity via call per second and/or concurrent session limits.
- Regularly checking call patterns for possible abusive traffic.

- All new customers are vetted with a combination of electronic and manual verification systems, credit reviews, references from trusted industry members, and previous experiences with customer executives and employees. The Voice Service Provider Company severely limits the capabilities of new accounts until these appropriate processes are complete

The Voice Service Provider Company has fully implemented STIR/SHAKEN.

Comtech Phones Corporation commits to fully responding within 24 hours to all traceback requests from the ITG, the TPTG, the FCC, and law enforcement. Comtech Phones Corporation shall cooperate with these groups to investigate and stop any illegal robocallers from using Company's service to carry or process illegal calls. When notified by the FCC's Enforcement Bureau, Company shall block and report identified illegal traffic, and any substantially similar traffic, on an ongoing basis (unless Voice Service Provider Company's investigation determines that the traffic is not illegal) when Comtech Phones Corporation receives actual written notice of such traffic from the Enforcement Bureau. If Voice Service Provider Company determines that the identified traffic is not illegal, Comtech Phones Corporation shall provide the Enforcement Bureau with an explanation as to why it reasonably concluded that the identified traffic is not illegal, and what steps it took to reach that conclusion.

The Voice Service Provider Company reserves the right to refuse traffic from any party at any time where robocalling or use of originating numbers that are not valid or they are not authorized to use has occurred or is suspected. Comtech Phones Corporation is able to block the originating number(s), terminating numbers(s), trunk(s) or customer, including termination of customer relationship to prevent robocalling, invalid originating number or spoofed origination number transiting the Company's networks.

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The Company will respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and cooperate

with such entities in investing and stopping any robocallers that use our network to originate robocalls.

**The Company reserves the right to modify and/or supplement this Robocall Mitigation Plan to adapt to risks and to improve the overall effectiveness of our program.**