

## **Schultz Technology Solutions LLC Robocall Mitigation Compliance with TRACED Act**

Schultz Technology Solutions LLC (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.

The Company has fully implemented STIR/SHAKEN.

The Company commits to fully responding within 24 hours to all traceback requests from the ITG, the TPTG, the FCC, and law enforcement. The Company 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 Company's investigation determines that the traffic is not illegal) when Company receives actual written notice of such traffic from the Enforcement Bureau. If Company determines that the identified traffic is not illegal, Company shall provide the Enforcement Bureau with an explanation as to why Company reasonably concluded that the identified traffic is not illegal, and what steps it took to reach that conclusion.

The Company utilizes a combination of internal tools and third-party analytics vendors to check for Do Not Originate (DNO) numbers. In addition, the Company utilizes a combination of internal tools and third-party analytics vendors to detect invalid phone number formats, area codes and unassigned number blocks. The Company also utilizes data analytics to detect and investigate irregular and unexpected calling patterns, originating number use against customer profiles.

The Company utilizes the following third-party analytics vendors:

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

These vendors:

- Provide analytics and filtering solutions for call pattern analysis.
- Assists in identifying and blocking fraudulent robocalls.

These systems help ensure compliance with FCC robocall mitigation rules and enhance Company's ability to detect and prevent illegal traffic.

The Company utilizes a combination of internal tools and third-party analytics vendors and reviews to identify illegal robocalling in addition to a Know Your Customer (KYC) requirement to access the Company's networks. 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 verified 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 Company severely limits the capabilities of new accounts until these appropriate processes are complete.

Schultz Technology Solutions LLC 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](mailto: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](mailto:cdsupport@skyswitch.com)

The 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. The Company 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.