

HNB Venture Partners LLC dba EscapeWire Solutions

Robocall Mitigation Compliance with TRACED Act

HNB Venture Partners LLC dba EscapeWire Solutions (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 internal tools to check for Do Not Originate (DNO) numbers. In addition, the Company utilizes internal tools to detect invalid phone number formats, area codes and unassigned number blocks. The Company also utilizes data to detect and investigate irregular and unexpected calling patterns, and originating number use against customer profiles.

The Company reviews data to identify illegal robocalling in addition to a Know Your Customer (KYC) requirement to access the Company’s networks. The process includes:

- Close relationships with our VOIP customers, including frequent communications (daily and weekly). Most of our VOIP customers are also Managed IT Services customers.
- 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.