



Epic Touch Co submits this certification pursuant to section 63.6305(d) of the Federal Communications Commission's rules.

Identifying Information:

Epic Touch Co, FRN 00004923934

PO Box 1260, 610 S Cosmos

Elkhart, KS 67950

No other name used in business

Principals, affiliates, subsidiaries, and parent companies:

Principals: Epic Touch Co Inc. Board of Directors: Roxanna Grimes, Guy Grimes, Gabrielle LeBlanc and Dian Boaldin.

Subsidiary: Elkhart Telephone Co, Inc., OCN 1764, 610 S Cosmos, PO Box 817, Elkhart, KS 67950 (other business names in use: Epic Touch Co)

Neither Epic Touch Co nor Elkhart Telephone is a foreign voice service provider.

Individual responsible for addressing robocall mitigation related issues:

Harvey Taylor, Interim Chief Operations Officer

PO Box 817, 610 S Cosmos, Elkhart, KS 67950

(620)697-2111, htaylor@epictouch.com

Epic Touch Co (FRN 0004923934) provides a hosted voice solution using cloud-based VoIP services provided by Toly Digital Networks, Inc and CoreDial. Below are statements from each vendor:

Epic Touch Co (CoreDial) Robocall Mitigation Compliance with TRACED Act

Epic Touch Co (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 solutions to check for Do Not Originate (DNO) numbers. In addition, the Company utilizes a combination of internal tools and third-party solutions 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 uses data systems for analytics 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.

Epic Touch Co 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

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



Toly Digital Networks (Epic Touch Co)

Robocall Mitigation Plan

Know Your Customer

Company follows the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

Traceback

Company will respond to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls.

STIR/SHAKEN

Company was eligible for taking STIR/SHAKEN implementation extension received under 47 CFR § 64.6304 because we have fewer than 100,000 voice subscriber lines. However, is now fully STIR/SHAKEN compliant since June 30, 2021.

All the voice traffic that originates on our network is subject to the robocall mitigation program described below and is 100% STIR/SHAKEN compliant in partnership with TransNexus as the STI- Certificate Authority (STI-CA) service provider for the Company. Additionally, our network will support call termination services for our customers where we are not originating the call but passing the call over our networks/partners via SIP and ensuring we or our partners maintain STIR/SHAKEN information in the SIP messaging. This is also part of all new customer verification and testing prior to implementing services.

Robocall Mitigation Program

Company uses software provided by TransNexus to monitor our outbound voice traffic to identify and prevent the potential 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, in the FCC consumer complaint database or has a poor reputation. 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, we either warn them to stop or terminate their service as appropriate.

Additionally, we provide our customers tools when receiving inbound calls to utilize STIR/SHAKEN information (or lack thereof), as well as other filters to help identify and/or screen potential robocalls.