

Orbitel Communications
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ROBOCALL MITIGATION PLAN

Orbitel Communications is a broadband provider that offers interconnected VoIP services to its subscribers on a resold basis. Orbitel's wholesale VoIP provider is Alianza, Inc. ("Alianza"), a provider of wholesale and retail VoIP and other communications services across the United States.

While Orbitel Communications necessarily relies on the robocall mitigation policies, procedures, and safeguards instituted by Alianza, Orbitel has also adopted this robocall mitigation plan to take its own measures to limit the potential for the origination of unlawful robocalls by its customers that would be carried and processed by Alianza and other downstream providers.

Know-Your-Customer Procedures

The vast majority of our end-user customers are either residential or single-party business lines. As part of our standard operating procedures, we perform due diligence with new and renewed customers, verifying the customer's identity and determining whether they are a business or residential customer. A valid address must be associated with a number during activation. To ensure accuracy, we verify the address by cross-checking it with the MSAG and the United States Postal Service.

Orbitel's services are provided to fixed locations using its own network and services are typically installed on location by qualified personnel, so Orbitel knows the actual location of its customers. Orbitel will not provide VoIP telephone service if a new customer's identification cannot be verified

Service Terms: Customers that use Orbitel's telephone service for any unlawful purposes, including unlawful robocalls, are subject to suspension or termination of service.

Know-Your-Upstream Providers Procedures

Orbitel incorporates the measures implemented by Alianza to know its upstream providers, as reflected in Alianza's Robocall Mitigation Plan. Alianza has existing agreements with Tier-1 carrier service providers from which it facilitates the provision of the service to its service provider customers. Alianza has confirmed that each of those carriers are listed in the Robocall Mitigation Database.

Enforcement

Orbitel commits to providing a complete response to all traceback requests within 24 hours and to cooperating with state and federal regulators in efforts to prevent illegal robocalls. Additionally, Orbitel agrees to provide relevant non-proprietary information in response to legitimate inquiries regarding illegal robocalls and suspicious activity.