



Kornerstones Inc dba UWS Telecom
510 Beechnut Dr.
Blue Bell, PA 19422

Robocall Mitigation Compliance with TRACED Act

Kornerstones Inc. dba UWS Telecom 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.

Kornerstones Inc., nor any of our executives or principals have a history of enforcement actions for illegal robocalls, TCPA or TSR violations or related state law violations.

We use the affirmative and effective measures detailed below to prevent the origination or transit of illegal robocalls.

Know Your Customer

We follow 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

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

STIR/SHAKEN Extensions

We are a reseller of voice services hosted on VoIP platforms by PayG LLC dba SkySwitch ("SkySwitch") and do not have the capability to implement STIR/SHAKEN. SkySwitch has implemented STIR/SHAKEN protocols in their networks (RMD0002940).

PayG LLC dba SkySwitch

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

Robocall Mitigation Program

We use software provided by SkySwitch to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls. Combining behavioral analytics, caller authentication and verification, our solution features:

- **Fraud Detection:** Detection of high volume robocalling, spoofing and spam call activity.
- **Subscriber Notification:** Caller ID Name override to warn subscribers of suspicious calls.
- **Call Blocking Support:** Accurate identification enabling you to block fraudulent phone calls as per the TRACED Act (2019)
- **Business Number Verification:** Register legitimate business numbers to prevent unintentional call blocking.
- **Caller ID Name Service:** Easy integration of Caller ID name lookup service, including robocall mitigation with override to include original caller ID even when call is determined fraudulent.

Kornerstones Inc. 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. Kornerstones Inc. 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 Kornerstones Inc.'s networks.

In addition, we have implemented a Call Abuse Policy and have published the following policy to our web site, terms of use, and have notified our customers of the policy as copied below:

"Any call originated on the Kornerstones Inc. network is subject to inspection and investigation if the call is suspected of being fraudulent, abusive, or illegal. Calls meeting any of these criteria will be blocked. If these conditions are repeated, becoming excessive, the subscriber may be disconnected from Kornerstones Inc. network, may be subject to further investigation by the FCC for enforcement of the TRACED Act and the subscriber may be subject to fines and penalties imposed by the FCC or the jurisdictional court."