

CTS COMPANIES

ROBOCALL MITIGATION PLAN

CTS Companies is a reseller of voice over Internet Protocol (VoIP) service. Our wholesale network provider is Reinvent Telecom. This Robocall Mitigation Plan describes the specific reasonable steps that CTS Companies has taken to avoid the origination, carrying, or processing of illegal robocall traffic on our wholesale provider's network.

Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Calls

CTS Companies has a "know-your-customer" policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic.

As part of its onboarding process for business customers, CTS Companies undertakes various commercially reasonable precautions prior to entering into a formal written agreement. All prospective business customers participate in an in-person or telephonic enrollment/contract process. In addition, CTS Companies investigates the prospective business customer's background, taking steps such as checking for a company website, determining how long the business has been operating, and confirming their corporate status with the applicable State Secretary of State's office or website, along with other indications of a legal, operating business. CTS Companies collects and as needed, verifies the following data on prospective business customers as part of its investigatory process:

- Physical business location
- Contact person(s)
- State or country of incorporation
- Federal tax ID number
- General nature of the business

In addition, if CTS Companies were to receive a request for high-volume origination services, it would exercise caution and extensively investigate such customers before granting access to the services.

Furthermore, CTS Companies has an Acceptable Use Policy which contains provisions that allow us to suspend or terminate the services of a customer engaged in illegal robocalling or otherwise abusing our services.

“Know-Your-Upstream Provider” Procedures

CTS Companies relies upon the “Know-Your-Upstream Provider” procedures of its wholesale provider, CTS Companies is confident that Reinvent Telecom exercises due diligence before accepting traffic from an upstream provider.

Use of Call Analytics Systems

CTS Companies relies on the analytics software of its wholesale provider, Reinvent Telecom, to alert us to any suspicious calling patterns that suggest a customer may be engaged in illegal robocalling.

Commitment to Respond to Traceback Requests

CTS Companies commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping illegal robocallers that use its service to originate, carry, or process illegal robocalls.