

Xentric Solutions, Inc. Robocall Mitigation Compliance with TRACED Act

Xentric Solutions, Inc. (“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 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 the Know Your Customer (KYC) requirement, including the following processes:

- Interview all new customers regarding their business and business practices via in-person, remote video and/or telephone meetings.
- New customers are verified with a combination of electronic and manual verification systems, credit reviews, references from trusted industry members, and/or previous experiences with customer executives and employees.
- The Company severely limits the capabilities of new accounts until these appropriate processes are complete.

Xentric Solutions, Inc. has one upstream provider from which it receives voice traffic, and is reliant upon that provider to comply with all network-related robocall mitigation efforts:

1. PayG LLC dba SkySwitch
Arborcrest 1, 751 Arbor Way
Suite 150
Blue Bell, PA 19422
Phone: 747.777.8100
Email: support@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 the Company’s networks.