

Callicity® Robocall Mitigation Compliance with TRACED Act

Callicity® (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.

Know Your Customer

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.

Traceback Request Responses

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 our upline suppliers, as noted in Robocall Mitigation Program section below, to check for Do Not Originate (DNO) numbers. In addition, the Company utilizes a combination of internal reviews and our upline suppliers, as noted in Robocall Mitigation Program section below, 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.

Robocall Mitigation Program

Callicity® has four upstream providers from which we send/receive 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. Telnyx, LLC
311 W. Superior Street, Suite 504
Chicago, Illinois 60654
Phone: 888-980-9750
Email: support@telnyx.com

3. Twilio, Inc.
101 Spear Street, Suite 500
San Francisco, CA 94105
Phone: 415-390-2337

We rely on these carriers to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls. Any further clarification regarding monitoring should be directed to them as needed.

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:

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.