

Nexxis, Inc.

Robocall Mitigation Plan

Introduction

This document details the reasonable steps and actions taken by Nexxis, Inc. (“Nexxis”) to mitigate and eliminate illegal robocalling. Nexxis has an ongoing commitment to scan for and help alleviate illegal robocalling by pre-qualifying prospective customers, monitoring existing customers for traffic patterns indicative of prohibited robocalls, and working with other providers and regulatory agencies in combatting fraudulent voice activity.

Nexxis provides interconnected Voice over Internet Protocol (“VoIP”) calling services. All telecom services are provided on a resold basis. As a telecom reseller, Nexxis utilizes a combination of internal tools and third-party solutions to monitor networks for fraudulent voice calling patterns. Our underlying VoIP provider is Skyswitch.

Know Your Underlying Provider

Nexxis, Inc. has master service agreements with Skyswitch and has received written assurances from their officials that it has and will continue to sign calls submitted to Nexxis, Inc. and will abide by the FCC’s STIR/SHAKEN and robocall mitigation rules in all respects when providing voice services to Nexxis. Nexxis and its upstream providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Know Your Customer

Screening interviews are performed to understand potential customer business models and the potential, or lack thereof, for involvement in fraudulent robocalling schemes. 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.

In our research of the prospect, Nexxis will not activate clients that provide anonymous information or where data mismatches are found. Additionally, prospects are required to agree to Nexxis’ strict policies and contractual terms prohibiting the act of fraudulent voice activity as a condition of doing business with Nexxis.

Individuals associated with prospects or current customers who have been known to act improperly or otherwise be involved in fraudulent robocalling will cause their companies to be rejected by Nexxis as a customer and any existing customer relationships could potentially be severed.

Traceback Requests

Nexxis is committed and will respond fully within 24 hours to all Traceback Requests from the FCC, law enforcement agencies, and the industry traceback consortium and vows to cooperate with these agencies in investigating and stopping any illegal robocallers that use our service to make calls. Nexxis will devote sufficient resources to provide prompt and complete information to traceback requests. Our point of contact to handle all traceback requests is:

Anthony Camello

631-247-0783

ajoseph@mynexxis.com

When notified by the FCC's Enforcement Bureau, Nexxis 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.

If a traceback exposes an existing customer as the source of fraudulent robocalls, or as having transmitted fraudulent robocalls, a demand for an explanation and verification of mitigation of the traffic is issued to the customer. If the fraudulent traffic is not remediated, Nexxis immediately begins rejecting all traffic from the offending customer.

Telephone Numbers

A Telephone Number ("TN") based caller identity is the originating phone number included in call signaling used to identify the caller for screening purposes that is uniquely associated with the subscriber. A subscriber is permitted to use a TN as a caller identity if a TN is directly managed by Nexxis and/or obtained by Nexxis from Nexxis' upstream provider for use by the subscriber. Numbers can also be allocated by Nexxis or ported using information from previous bill matching customer information.

For subscribers with multi-line telephone systems, Nexxis and our underlying provider only allow calls to be connected if the originating number matches one of the TN's assigned to the subscriber. This screening capability enables an automated and secure method of validating originating telephone numbers.

International Calling

Nexxis is not currently an international voice services provider. If at any time Nexxis does decide to sell our services to international customers using North American Numbering Plan resources, we will familiarize ourselves with and develop best practices for full vetting of such customers and work with our underlying provider to perform the necessary telephone number validation on all international originated calls.

Call Analytics

Nexxis utilizes a combination of internal tools and third-party solutions to check for Do Not Originate (DNO) numbers. In addition, the Company utilizes a combination of internal tools and third-party solutions 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. Call analytics are provided by Skyswitch.

Ongoing Robocall Mitigation

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, and regularly checking call patterns for possible abusive traffic.

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 can 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.

Nexxis Contact for Robocall Mitigation-Related Issues

The Company will update our Robocall Mitigation filings within 10 business days of any change to the information outlined in this plan. Please direct any questions related to Robocall Mitigation issues to:

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