



Advanced Hosted Services, Inc.

Robocall Mitigation Plan

We are a reseller on PayG LLC dba SkySwitch (RMD0002940) and do not have the capability to implement STIR/SHAKEN. PayG LLC dba SkySwitch has implemented STIR/SHAKEN protocols in their IP Voice networks.

We have not been prohibited from filing a certification in the Robocall Mitigation Database.

Advanced Hosted Services, 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

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 the 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.

STIR/SHAKEN Extensions

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

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Robocall Mitigation Program

We utilize a combination of internal tools and third-party solutions to check for Do Not Originate (DNO) numbers. We rely on software provided by PayG LLC dba 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.
- **Do Not Call Registry:** We comply with the FTC's rules for the Do Not Call Registry.

In addition, we have implemented a Call Abuse Policy, as it pertains to the TRACED Act. 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.