

Ozonetel Communications, Inc.

Robocall Mitigation Plan

Updated: September 2025

Introduction

This document details the steps taken by Ozonetel Communications, Inc. (“Ozonetel” or “Company”) to avoid originating illegal robocalling.

Ozonetel provides resold interconnected VoIP services to non-residential customers. Ozonetel does not own or control facilities that would enable it to implement the STIR/SHAKEN authentication framework. Accordingly, the Company is exempt from a STIR/SHAKEN implementation obligation. *See First Caller ID Authentication Report and Order*, 35 FCC Rcd at 3241, para. 40; 47 CFR Section 64.6304(b).

Know Your Customer

Ozonetel serves only commercial customers. It verifies its customers by collecting the customer’s DUNS number and a physically signed agreement.

Ozonetel will not activate clients that provide anonymous information or where data mismatches are found. Additionally, prospective customers must agree to the Company’s strict policies and contractual terms prohibiting illegal and/or fraudulent calling as a condition of doing business. Customers are also required to be compliant with Do Not Call requirements.

Traceback Requests

Ozonetel 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 will cooperate with these agencies to investigate and stop any illegal robocallers that use its service to originate calls. Ozonetel will devote sufficient resources to provide prompt and complete information to traceback requests. The Company’s point of contact to handle all traceback requests is:

Vasna Vasant, Manager
Phone : 206-902-0654

Upon receiving a traceback request, Ozonetel will provide call logs stored in its software that are needed to investigate the suspect calling. Call logs are stored for 12 months.

If a traceback exposes an existing customer as a potential source of illegal robocalls, Ozonetel will contact the customer for an explanation. If the traffic is determined to be illegal robocalling, the Company will suspend and/or disconnect the customer’s service.

Telephone Numbers

Ozonetel confirms a customer's right to use a telephone number by requiring documentation from the customer of its prior ownership of the number before porting the number to Ozonetel's service. Customers are not permitted to set a caller ID unless they are subscribed to that telephone number.

International Calling

Ozonetel allows its customers to utilize NANPA numbers from international locations in certain circumstances. For instance, customers who have agents physically located in foreign countries such as India or the Philippines may obtain U.S. numbers to call prospects within the U.S. The U.S. numbers are obtained from Twilio and Telnyx. Customers are fully vetted to prevent illegal robocalling.

Call Analytics

As a reseller, Ozonetel relies on its underlying providers and/or their third-party vendors to determine if originating calls should be blocked based on call analytics. The Company has not contracted directly with any third-party vendors for call analytics.

Ongoing Robocall Mitigation

Ozonetel reviews customer call logs if it suspects suspicious call activity and/or calling patterns. When the Company and/or its underlying providers detect network usage patterns consistent with illegal robocalling, we will immediately seek to identify the party originating the calls and take appropriate action, which may include service disconnection.

Company Name Contact for Robocall Mitigation-Related Issues

The Company will update its 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:

Vasna Vasant, Manager
103 Carnegie Center, Suite 300
Princeton, New Jersey
Phone: 206-902-0654
vasna.vasant@ozonetel.com