

Slingshot Data Labs, LLC Robocall Mitigation Compliance with TRACED Act

Slingshot Data Labs, LLC (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.

The Company has fully implemented STIR/SHAKEN.

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, the Company shall block and report identified illegal traffic, and any substantially similar traffic, on an ongoing basis (unless the Company’s investigation determines that the traffic is not illegal) when the Company receives actual written notice of such traffic from the Enforcement Bureau. If the Company determines that the identified traffic is not illegal, the Company shall provide the Enforcement Bureau with an explanation as to why the Company reasonably concluded that the identified traffic is not illegal, and what steps it took to reach that conclusion.

The Company relies on SkySwitch (PayG LLC) and CoreDial LLC as our third-party analytics providers to identify and block illegal or suspicious call traffic on our behalf. SkySwitch and CoreDial utilize a combination of internal tools and other third-party solutions to check for Do Not Originate (DNO) numbers, detect invalid phone number formats or unassigned number blocks, and use data analytics to investigate irregular or unexpected calling patterns and originating-number usage.

The Company also uses data systems for analytics and review 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.
- Verifying all new customers with a combination of electronic and manual processes, credit reviews, references from trusted industry members, and prior experiences with customer executives and employees. The Company severely limits new-account capabilities until these procedures are complete.

Slingshot Data Labs, LLC has two upstream providers from which it receives 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. CoreDial LLC

Arborcrest 1, 751 Arbor Way, Suite 150

Blue Bell, PA 19422

Phone: 215.297.4400

Email: cdsupport@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 invalid or unauthorized has occurred or is suspected. The Company can block originating number(s), terminating number(s), trunk(s), or even terminate a customer relationship in order to prevent robocalling, invalid originating numbers, or spoofed originating numbers from transiting the Company's networks.