

PULSEONE COMMUNICATIONS ROBOCALL MITIGATION PLAN

Pursuant to 47 C.F.R. § 64.6305, PulseOne Communications (“PulseOne Communications”, “the Company”) submits this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls.

This report describes the practices and procedures which PulseOne Communications has in place to protect its business customers and to mitigate illegal robocalls. PulseOne Communications may modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time in order to respond to changes in its business, its capabilities and its needs.

PulseOne Communication has not been prohibited from filing in the Robocall Mitigation Database pursuant to a law enforcement action, and none of its prior certifications have been removed from the Database by the Commission.

PulseOne Communications has not been, at any time in the prior two years, the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with the Company’s findings of actual or suspected wrongdoing due to it transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

The Company is fully reliant upon its underlying carriers who provision the platform and services which the Company resells in order to support its business customers with telecommunications products and services. The Company is a switchless reseller.

PulseOne Communications, Inc. is registered with the Federal Communications Commission (“FCC”) and holds the 499 Filer ID number of **833380**. The Company’s FRN/CORESID Number is 0028990927.

THE COMPANY PRIMARY PLACE OF BUSINESS

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Website: www.pulseonecomm.com
General Email: support@pulseonecomm.com

LEADERS OF THE COMPANY ARE:

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DESIGNATED RMD CONTACT

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STIRSHAKEN COMPLIANCE

Through its underling carriers the Company is fully compliant as a switchless reseller. As a switchless reseller PulseOne Communications does not own its own network or infrastructure of any kind and therefore has no access to any IP portion of any call, or a SIP header of any call.

ROBOCALL MITIGATION PLAN

This Robocall Mitigation Plan describes the specific measures that the PulseOne Communications has implemented to detect and prevent illegal robocalls on its network as of June 30, 2023. PulseOne Communications will periodically evaluate the risks it faces, the effectiveness of its policies and procedures, and its capabilities to support the measures described. Should PulseOne Communications determine that changes are appropriate, its practices may differ from those described below.

Risk Assessment. PulseOne Communications is a switchless reseller that offers calling products by use of an underlying platform provider who owns the infrastructure to support VoIP calling. The Company resells these services to business customers. The Company's customers do not typically originate high volume short duration ("HVSD") calls and PulseOne Communications has not received information suggesting that robocalls are originated by any of its customers. Therefore, PulseOne Communications leadership does not consider the Company at high risk of originating illegal robocalls.

KNOW YOUR CUSTOMER

PulseOne Communications has a rigorous KYC policy for the in order to support the Business Customers that it resells services to. PulseOne Communications has an in-depth presales process where representatives of PulseOne Communications work with the prospect or customer to understand all the unique factors of the Customer's business. This objective of this is two fold: a. to get to know the customer; and b. to provide the best possible service to the customer by fully understanding all facets of their business.

PulseOne Communications performs a thorough reputation check on each of its customers and verifies the following information: legal business name, legal form of business, federal tax ID, nature of the business, primary contact person, and service address.

Not only does PulseOne Communications have a rigorous intake and Onboarding process where it secures extensive information for Customers but all relationships between PulseOne Communications and customers are governed by an MSA. The MSA specifically states the business customer is not able to resell any services are sold to the customer by PulseOne Communications.

PulseOne Communications conducts due diligence on new and renewing customers, confirming the customer's identity and, if it is a business, is incorporation documents. PulseOne Communications confirms the customer's service address for all customers.

- PulseOne Communications verifies customer's business reputation prior to providing service.
- PulseOne Communications verifies customer information when contracts are renewed or services are added.
- PulseOne Communications verifies the customer's identity and their right to use the telephone number presented on calls.
- PulseOne Communications has a specific Acceptable Use Policy ("AUP") which defines all Company policies regarding the circumstances by which PulseOne Communications will deny, suspend or terminate service to a customer for violation of any robocalling policies or other usage policies which the company has.

When the Company commences operations with a customer, the Company verifies all new customers with a combination of electronic and manual verification systems, 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.

Additionally, as mentioned above all Company customers are required to agree to, and; are contractually bound by PulseOne Communications strict policies, contractual terms and conditions and a Company Acceptable Use Policy (“AUP”) prohibiting the act of fraudulent voice activity as a condition of doing business with PulseOne Communications.

If any customer is found to be in possible and/or or actual violation of any Company policy as it relates to suspicious traffic and/or possible fraud, the Company has the right to immediately halt, cease and/or suspend the customers account or associated telephone numbers.

Measures to Prevent or Avoid Illegal Robocalls

- PulseOne Communications has in place an enforceable terms of use and/or an acceptable use policy. PulseOne Communications also has in place policies designed to detect and prevent fraudulent traffic on its network.
- PulseOne Communications uses analytics technologies and services provided by its upstream provider and third parties to monitor traffic on its network and identify potentially unlawful call origination activity. If PulseOne Communications has a reasonable basis to believe that a customer is originating illegal robocalls, it will require the customer to remedy the problem and, if effective action is not taken, PulseOne Communications can suspend and/or terminate service to the customer by the use of the underlying platform which is provided by the underlying carrier.
- PulseOne Communications has a protocol to work with the Company’s upstream provider to block various types of calls by default by using the tools provided to the Company by the underlying provider who supports the platform.

TRACEBACK

PulseOne Communications is committed to cooperating with the Federal Communications Commission (FCC), law enforcement, and the industry traceback consortium in investigating and stopping any illegal robo-callers that it learns are using our service to originate calls or transit calls into the United States and territories.

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 robo-callers 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.

The Company utilizes a combination of tools provided by its underlying carriers and platform providers along with 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.

UPSTREAM PROVIDERS

As a switchless reseller, PulseOne Communications uses the services and provisioned platforms from a number of upstream providers. The two key primary upstream providers listed below provide the platform to PulseOne Communications. As a switchless reseller, the Company does not own its own infrastructure. Further the Company is reliant upon its upstream provider for switching customer calls that originate on its platform. And the Company does not have access to the SIP header of any VoIP call.

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

As stated, the Company (as a switchless reseller) by leveraging its underlying platform provider. The company has the ability thought this platform and with the interaction of the upstream provider, to reserve the right to refuse traffic from any party at any time where robocalling or use of originating numbers that are not valid.

The Company (as a switchless reseller) by its underlying platform provider 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.

ONGOING ROBOCALL MITIGATION

PulseOne Communications monitors and examines call detail records (CDRs) on a repeating basis to detect suspicious call activity and/or calling patterns. When PulseOne Communications, or its underlying provider detects network usage patterns consistent with illegal robocalls or suspects illegal robocalling is taking place, PulseOne Communications will immediately seek to identify the party that is originating, terminating, or routing these calls and take appropriate action.

The actions taken may include, but are not limited to, initiating a traceback investigation; verifying that the originating customer owns or is authorized to use the Caller ID number; determining whether the Caller ID name sent to a receiving party matches the customer's corporate and/or d/b/a name; blocking the party's ability to originate, terminate, or route calls on the network; and/or providing notice to law enforcement authorities.

As part of Company plan to mitigate and prevent any originating robocalls, PulseOne Communications is committed to early identification and investigation of possible robocalling conditions. Among other things, with the tools and resources provided to the Company by its underlying carrier, PulseOne Communications watches for higher-than-normal subscriber traffic volume, including large bursts of traffic in small timeframes or spikes in usage. With the tools provided to the Company by its underlying provider, PulseOne Communications also monitors for originating calls classified as high volume short duration ("HVSD"), tracks for low call completion percentages, and/or originating calls with sequential called-to-number dialing patterns (of which as mentioned earlier in this plan has a history of being benign).

COMPANY DECLARATION

The Company certifies that it has never been under investigation or committed any violations within the last two years with any local, state, or Federal agency or equivalent related to telemarketing or robocalling. Additionally, the Company is not currently subject to a formal action or investigation due to suspected unlawful robocalling or spoofing.

If when and as the Company business may change designated Company representatives only will update this RMP as appropriate.