

Joshua Garay LLC 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. Joshua Garay LLC has fully implemented STIR/SHAKEN. Joshua Garay commits to fully responding within 24 hours to all traceback requests from the ITG, the TPTG, the FCC, and law enforcement. Joshua Garay LLC shall cooperate with these groups to investigate and stop any illegal robocallers from using Joshua Garay's service to carry or process illegal calls. When notified by the FCC's Enforcement Bureau, Joshua Garay LLC shall block and report identified illegal traffic, and any substantially similar traffic, on an ongoing basis (unless Joshua Garay's investigation determines that the traffic is not illegal) when Joshua Garay receives actual written notice of such traffic from the Enforcement Bureau. If Joshua Garay determines that the identified traffic is not illegal, Joshua Garay shall provide the Enforcement Bureau with an explanation as to why Joshua Garay reasonably concluded that the identified traffic is not illegal, and what steps it took to reach that conclusion. Joshua Garay utilizes a combination of internal tools and third-party solutions to check for Do Not Originate (DNO) numbers. In addition, Joshua Garay utilizes a combination of internal tools and third-party solutions to detect invalid phone number formats, area codes and unassigned number blocks. Joshua Garay also utilizes data analytics to detect and investigate irregular and unexpected calling patterns, originating number use against customer profiles. Joshua Garay uses data systems for analytics and reviews to identify illegal robocalling in addition to a Know Your Customer (KYC) requirement to access Joshua Garay'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.
- 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.

Joshua Garay severely limits the capabilities of new accounts until these appropriate processes are complete. Joshua Garay 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. Joshua Garay 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 Joshua Garay's networks