

Go Technologies Management, LLC

ROBOCALL MITIGATION PLAN

Go Technologies Management, LLC (“Go Tech”) is a wholesale and retail provider of mobile data and telephone services provided through a resale agreement with AT&T.

While Go Tech necessarily relies on the robocall mitigation policies, procedures, and safeguards instituted by AT&T, Go Tech has also adopted this robocall mitigation plan to take its own measures to limit the potential for the origination of unlawful robocalls by its customers that would be carried and processed by AT&T and other downstream providers.

Know-Your-Customer Policies

Subscriber Vetting: Go Tech vets the identity of its customers when approving an application and entering into a contract for telephone services. As part of this vetting process, Go Tech collects the customer’s legal name, address, and contact information, and may require additional information to validate the customer. This information enables Go Tech to validate the identity of potential customers prior to provisioning of service. Go Tech will not provide service if a new customer’s identification cannot be verified.

Contractual Terms:

Wholesale Services:

Go Tech’s Sub-Reseller Agreement (“Sub-Reseller Agreement”) prohibits the use of Go Tech’s service in any way that violates AT&T’s Acceptable Use Policy (“AT&T AUP”) or that is unlawful, or in connection with any criminal, civil or administrative violation of any applicable local, state, provincial, federal, national, or international law, treaty, court order, ordinance, regulation or administrative rule. Go Tech may terminate or suspend “an affected service...either with respect to an individual End User of Sub-Reseller or with respect to Sub-Reseller taken as a whole” if it determines that the customer has violated the contractual terms of the Sub-Reseller Agreement or the AT&T AUP.

Retail Services:

Go Tech’s Management Wireless Agreement (“Wireless Agreement”) prohibits the use of Go Tech’s service in any way that violates AT&T’s Acceptable Use Policy (“AT&T AUP”) or for any unlawful purpose. Go Tech may terminate or suspend the customer’s service if it determines that the customer has engaged in unlawful use of service or violated the contractual terms of the Wireless Agreement or the AT&T AUP. The agreement also allows Go Tech to change, reassign, or eliminate a customer’s mobile telephone number under certain circumstances, including fraud prevention and regulatory or statutory law enforcement requirements.

Use of Call Analytics to Identify and Block Unlawful Traffic

Go Tech relies on AT&T's use of call analytics systems to identify and block unlawful robocall traffic as set forth in AT&T's robocall mitigation plan on file with the FCC. AT&T reports that it "has a robust robocall monitoring program to identify and block illegal robocalls on its networks ... [that] leverages a broad set of data from internal proprietary as well as public sources [including] ... average call duration, call completion rates, calling identification name, call volumes and the timeframes in which calls are placed, sequential dialing patterns, complaint data (including from the [FCC and FTC], and call volumes to telephone numbers on the [FTC's] Do Not Call List" which "allows AT&T to compile information on telephone numbers used to place calls with suspicious characteristics [and] ... observe indications that a particular telephone number may be part of an illegal robocall scheme." Go Tech's customers can use the AT&T's ActiveArmor app to choose to block calls that AT&T has identified as spam.

If Go Tech receives a notification from AT&T of suspected unlawful robocall traffic originated by a Go Tech end user customer, Go Tech will conduct an investigation. To the extent a customer is found to have violated Go Tech's contractual terms, Go Tech will take action commensurate with the severity of the customer's offense, including, but not limited to, providing the customer with a warning or terminating the customer's service.

Knowledge of Upstream Providers

Go Tech's upstream provider, AT&T, is a well-known, reputable service provider that is registered in the FCC's Robocall Mitigation Database. Go Tech does not have direct knowledge of the upstream providers from which AT&T receives traffic, but understands that AT&T is required to accept traffic only from service providers that similarly have represented to the FCC that they have policies and procedures to identify and block unlawful robocall traffic.

Cooperation with the Traceback Group, Law Enforcement and Government Agencies

Go Tech is committed to responding fully and within 24 hours to all traceback requests made by the Industry Traceback Group ("ITG"), law enforcement authorities, and government agencies to investigate and address suspected unlawful robocalls originated by Go Tech's customers, and will cooperate with AT&T on traceback requests.