



CDC Holdings, LLC (dba: Gravity Networks) Robocall Mitigation Plan

CDC Holdings, LLC (dba: Gravity Networks) 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.

We are a reseller of PayG LLC dba SkySwitch (RMD0002940), (referred to below as: “The Company or Company”), and do not have the capability to implement STIR/SHAKEN. PayG LLC dba SkySwitch has implemented STIR/SHAKEN protocols in their IP Voice networks.

We have not been prohibited from filing a certification in the Robocall Mitigation Database.

CDC Holdings, LLC (dba: Gravity Networks), nor any of our executives or principals have a history of enforcement actions for illegal robocalls, TCPA or TSR violations or related state law violations.

CDC Holdings, LLC (dba: Gravity Networks) and the Company commit 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 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 internal tools and 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.

The Company uses data systems for analytics and reviews to identify illegal robocalling. In addition, we follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>). 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. CDC Holdings, LLC (dba: Gravity Networks) severely limits the capabilities of new accounts until these appropriate processes are complete.



CDC Holdings, LLC (dba: Gravity Networks) utilizes hosted VoIP platforms from:

1. PayG LLC dba SkySwitch
Arborcrest 1, 751 Arbor Way
Suite 150
Blue Bell, PA 19422
Phone: 747.777.8100
Email: support@skyswitch.com

CDC Holdings, LLC (dba: Gravity Networks) and the Company 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. The Company 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.

In addition, we have implemented a Call Abuse Policy, as it pertains to the TRACED Act, and have published the following policy to our web site, terms of use, and have notified our customers of the policy as copied below:

“Any call originated on CDC Holdings, LLC’s (dba: Gravity Networks) network is subject to inspection and investigation if the call is suspected of being fraudulent, abusive, or illegal. Calls meeting any of these criteria will be blocked. If these conditions are repeated, becoming excessive, the subscriber may be disconnected from CDC Holdings, LLC’s (dba: Gravity Networks) network, may be subject to further investigation by the FCC for enforcement of the TRACED Act and the subscriber may be subject to fines and penalties imposed by the FCC or the jurisdictional court.”