

Robocall Mitigation Plan

Business Information

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Overview

The FCC requires that all small voice service providers ("VSPs") certify in the Robocall Mitigation Database that they have implemented a Robocall Mitigation Plan ("RMP") to ensure that they are not originating illegal robocalls.

The FCC requires that VSPs develop a RMP that:

- details the reasonable steps taken to avoid originating illegal robocalls;
- demonstrates a commitment to respond to traceback requests to cooperate with investigators and stopping illegal robocalls; and
- is filed in the Robocall Mitigation Database.

The FCC states that a RMP is sufficient if the detailed practices in the plan can reasonably be expected to significantly reduce the origination of illegal robocalls and the VSP complies with the practices it describes in its filing.

Purpose

York Telecom Corp. ("Yorktel") is dedicated to stopping illegal calls from originating in our network and monitoring the calls coming into our network. This document delineates Yorktel's RMP.

Know Your Customer ("KYC")

The accurate identification of a subscriber in the STIR/SHAKEN ecosystem is tied to a telephone number-based caller identity associated that subscriber. A subscriber is an entity that has a business relationship with Yorktel in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

Yorktel's KYC program involves obtaining specific subscriber information when payment is made for services. This process includes collecting such information such as:

- physical business location;
- contact person(s);
- nature of the customer's business.

Acceptable Use Policy ("AUP")

Yorktel maintains an AUP that subscribers must sign before being permitted to use Yorktel's network. Among other things, the AUP prohibits:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable law;
- violating applicable industry accepted guidelines; and
- using Yorktel's service to engage in or in connection with fraudulent activities.

Yorktel's contractual terms with subscribers specify that Yorktel may take action up to suspension or termination of service for violation of the AUP.

Telephone Number Authorization

A Telephone Number ("TN")-based caller identity is the originating phone number included in call signaling used to identify an outbound caller for screening purposes that is uniquely associated with the subscriber. A subscriber is permitted to use a TN as a caller identity if a TN is directly managed by Yorktel and/or obtained by Yorktel from one of Yorktel's underlying carriers for use by the subscriber. In most cases, Yorktel directly manages the TNs used by its subscribers. Yorktel tracks these numbers in its inventory system and monitors the assignment of these numbers. In these cases, TN validation is the inherent result of Yorktel's assignment of the TN to its subscriber.

If a subscriber wishes to use a TN as a caller identity and that TN is not directly managed by Yorktel, then TN validation is necessary. If a subscriber's end-user can provide a valid letter of authorization that they are the authorized user of such TNs, Yorktel will attest calls originated with these TNs.

When originating a call, Yorktel checks the calling party number against Yorktel's inventory and will not attest the call unless the calling party number is a TN that has been properly validated.

Monitoring

Yorktel works to detect a calling pattern consistent with illegal robocalls. If such a call is detected we will identify the party that is using our network to originate those calls and will take appropriate action. Taking appropriate action may include, but is not limited to, initiating a traceback investigation, verifying that the originating subscriber owns or is authorized to use the Caller ID number, and suspending or terminating the party's ability to originate calls on our network.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, our risk prevention team is alerted which follows the defined procedures on investigating such subscribers.

The procedures established include but are not limited to:

- checking recent and past call detail records and benchmark against expected trends;
- checking recent and past account activity and purchases;
- investigating if any system issue generates the strange behavior;
- verifying that the call originating path is valid; and

- contacting the subscriber to understand his or her particular use case and validate that the activity belongs to that subscriber.

Yorktel follows Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, Yorktel will devote sufficient resources to provide prompt and complete resources to traceback requests.

Blocking

Yorktel will implement Do Not Originate requests it receives from the ITG. Yorktel has mechanisms to automatically block suspicious calls using internal analytics. If Yorktel's monitoring systems identify suspected robocalling patterns that are confirmed with further investigation, Yorktel will take appropriate action which may include suspending or terminating the subscriber's use of Yorktel's network. Yorktel will cooperate with Investigative Bodies (provide a single point of contact to address traceback requests from law enforcement, including the state attorney general's office), to the FCC, and/or the ITG; as well as documenting requests & actions taken in response thereto.

Plan Updates

This plan and industry best practices must evolve to response to the dynamic nature of mitigating illegal robocalling. Yorktel will monitor industry best practices and continuously improve our internal processes to ensure this plan and our system adapt to this ever-changing issue.

In the event of any material change to this plan, Yorktel will republish it to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.