

1PATH MANAGED SERVICES, LLC

ROBOCALL MITIGATION PLAN

ABOUT 1PATH MANAGED SERVICES, LLC

1Path Managed Services, LLC (the Company) is a Limited Liability Company formed under the laws of Delaware and is a registered carrier with the FCC. The Company holds the FRN/CORES ID Number 0034347336 and holds 499 Filer ID Number 836403.

The business is a full range Managed Services Provider (MSP) that has been in operation for over 14 years providing IT full and co-managed services for small and medium sized companies. The Company services include help desk, network and server monitoring, cyber security, backup, patching and preventative maintenance, and IT consulting. As an adjunct to that business, the Company also provides some of its Customers with telecommunications products and services.

The Company resells the products and services of Tier 1 and Tier 2 Carriers, predominantly using the underlying service providers network since the Company has no facilities or switches to transport traffic. The Company has no switch, no internal telecommunications network and no facilities of any kind to support VoIP calling and offers no direct or hosted PBX utilizing its own network.

The Company's primary place of business is:

2300 Windy Ridge Parkway, Suite 685 South
Atlanta, GA 30339
678-695-5500
General email address: compliance@1path.com
Website: 1path.com

Leaders of the company are:

CEO:

James Hwang
2300 Windy Ridge Parkway, Suite 685 South
Atlanta, GA 30339
Direct Dial: 678-460-2526
Email Address: JHwang@1path.com

1PATH MANAGED SERVICES, LLC
ROBOCALL MITIGATION PLAN

CFO:

Megan Walker
2300 Windy Ridge Parkway, Suite 685 South
Atlanta, GA 30339
Direct Dial: 404-542-7469
Email Address: MWalker@1path.com

Designated RMD Contact:

Name: Chuck Bloodworth
2300 Windy Ridge Parkway, Suite 685 South
Atlanta, GA 30339
Direct Dial: 678-764-6565
Email Address: CBloodworth@1path.com

MEASURES TO PREVENT ORIGATION OF ILLEGAL CALLS:

Know Your Customer (KYC):

The Company has an in-depth presales process where representatives of the Company work with the prospect or customer to understand all the unique factors of the Customer's business. This objective of this is twofold: 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.

The Company's lengthy sales cycle and on boarding process ensures that the Company obtains a thorough knowledge of the Customer's business, how and where it is conducted, legal business name, legal form of business, primary contact person, and service address.

In addition, Customers are governed by service contract terms which specifically state the Customer may not resell any services which the Company provides, the services which are sold to the Customer are strictly for the Customers own internal use and none of the services the Company provides may be used outside of the services intended scope, features, and function set.

1PATH MANAGED SERVICES, LLC

ROBOCALL MITIGATION PLAN

STIR/SHAKEN Implementation

Company has no defined implementation related to STIR/SHAKEN and the parameters of call authentication framework. As a reseller with no switch, the Company is not able to implement SIR/SHAKEN in any manner. Since the Company lacks control over the facilities and network infrastructure necessary to implement STIR/SHAKEN the Company has no defined protocols in place.

Therefore, the Company is excluded from the FCC's STIR/SHAKEN implementation obligation pursuant to paragraph 40 of the FCC's First Call Authentication Report and Order. Alternatively, the Company relies on its underlying carrier partner(s), which own and maintain the network infrastructure, to implement and utilize STIR/SHAKEN authentication.

In relationship to the initial, and subsequent FCC Orders concerning STIR/SHAKEN and the Robocall Mitigation Database (RMD), the Company is without STIR/SHAKEN obligation.

NETWORK MONITORING AND CALL BLOCKING

The Company will rely on its underlying carrier partners to give notice if robocalls are detected.

The Company will work with its underlying service providers to block calls originating from its customers if necessary due to fraudulent activity. The Company will issue a request to the underlying carrier to block illegal calls.

TRACEBACK AND INQUIRY & RESPONSE

The Company commits to respond to all inquiries made by the FCC, law enforcement, the ITG and/or any other like or similar governing body within 24 hours of initial request. The Company is committed to combating robocalling and other nefarious acts and violators of the TCPA therefore the Company shall always fully cooperate with these groups to investigate and stop any illegal activity and persons who try to commit such bad acts from using Company's service to carry or process illegal calls.

1PATH MANAGED SERVICES, LLC

ROBOCALL MITIGATION PLAN

When notified by any agency, the ITG, any regulatory governing body and/or the FCC's Enforcement Bureau, Company will immediately direct its underlying provider to 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).

If and when the 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.

UPSTREAM PROVIDERS AND CALL ASSIGNMENT

Through its upstream providers the company resells and leverages the network of other carriers. The Company has no switch and does not provision its own traffic.

The Company utilizes the full facilities of these carriers and is not a gateway Provider. The Company does not deal with any Foreign Service Providers.

The carriers upon which the Company relies for complete networks services are:

1. Accessline Communications Corporation d/b/a Intermedia
2. AT&T
3. Verizon
4. Spectrotel
5. First Light
6. Comcast
7. Spectrum

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 notifies its underlying carriers to block the originating number(s), terminating numbers(s), trunk(s) or customer, including termination of customer relationship to prevent

1PATH MANAGED SERVICES, LLC

ROBOCALL MITIGATION PLAN

robocalling, invalid originating number or spoofed origination number transiting the Company's networks.

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 the Company business changes, the designated Company representatives will update this RMP as appropriate.