

Zirnet, LLC

Robocall Mitigation Plan

Introduction

This document details the reasonable steps and actions taken by Zirnet, LLC (“Zirnet”) to mitigate and eliminate illegal robocalling. Zirnet has an ongoing commitment to scan for and help alleviate illegal robocalling by pre-qualifying prospective customers, monitoring existing customers for traffic patterns indicative of prohibited robocalls, and working with other providers and regulatory agencies in combatting fraudulent voice activity.

Zirnet provides interconnected Voice over Internet Protocol (“VoIP”) calling services. Zirnet is fully STIR/SHAKEN implemented, has our own Token, and our OCN is 999L.

Know Your Underlying Provider

Zirnet, LLC has a master service agreement with our upstream providers and has received written assurances from their officials that it has and will continue to sign calls submitted to Zirnet, LLC and will abide by the FCC’s STIR/SHAKEN and robocall mitigation rules in all respects when providing voice services to Zirnet. Zirnet and its upstream providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Know Your Customer

Most of our subscriber’s phone services are setup by Zirnet’s internal IT team. Screening interviews are performed to understand potential customer business models and the potential, or lack thereof, for involvement in fraudulent robocalling schemes.

In our research of the prospect, Zirnet will not activate clients that provide anonymous information or where data mismatches are found. Additionally, prospects are required to agree to Zirnet’s strict policies and contractual terms prohibiting the act of fraudulent voice activity as a condition of doing business with Zirnet.

Individuals associated with prospects or current customers who have been known to act improperly or otherwise be involved in fraudulent robocalling will cause their companies to be rejected by Zirnet as a customer and any existing customer relationships could potentially be severed.

Traceback Requests

Zirnet is committed and will respond fully within 24 hours to all Traceback Requests from the FCC, law enforcement agencies, and the industry traceback consortium and vows to cooperate with these agencies in investigating and stopping any illegal robocallers that use our service to make

calls. Zirnet will devote sufficient resources to provide prompt and complete information to traceback requests. Our point of contact to handle all traceback requests is:

Paul Terzidis, CEO
718-777-2828 ext115
paul@zirnet.com

Upon calling our Traceback contact, an initial ticket is opened with our upstream vendors and they will fully cooperate with any investigations opposed by the FCC.

If a traceback exposes an existing customer as the source of fraudulent robocalls, or as having transmitted fraudulent robocalls, a demand for an explanation and verification of mitigation of the traffic is issued to the customer. If the fraudulent traffic is not remediated, Zirnet immediately begins rejecting all traffic from the offending customer.

Telephone Numbers

A Telephone Number (“TN”) based caller identity is the originating phone number included in call signaling used to identify the 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 Zirnet and/or obtained by Zirnet from Zirnet’s underlying carrier for use by the subscriber. Numbers can also be allocated by Zirnet or ported using information from previous bill matching customer information.

For subscribers with multi-line telephone systems, Zirnet and our underlying provider only allow calls to be connected if the originating number matches one of the TN’s assigned to the subscriber. This screening capability enables an automated and secure method of validating originating telephone numbers.

International Calling

Zirnet is not currently an international voice services provider. If at any time Zirnet does decide to sell our services to international customers using North American Numbering Plan resources, we will familiarize ourselves with and develop best practices for full vetting of such customers and work with our underlying provider to perform the necessary telephone number validation on all international originated calls.

Call Analytics

Zirnet relies primarily on our underlying provider and/or their third-party vendors to determine if originating calls should be blocked based on call analytics practices.

Ongoing Robocall Mitigation

Zirnet monitors and examines call detail records (CDRs) on a repeating basis to detect suspicious call activity and/or calling patterns. When illegal activity is detected in the network, our upstream providers will terminate/freeze the account until they speak to our Zirnet IT team. Together, we will immediately seek to identify the party that is originating, terminating, or routing these calls so that we may take appropriate action. The actions taken may include, but are not limited to initiating a traceback investigation; verifying that the originating customer owns or is authorized to use the Caller ID number; determining whether the Caller ID name sent to a receiving party matches the customer's corporate and/or d/b/a name; block the party's ability to originate, terminate, or route calls on the network; and/or providing notice to law enforcement authorities.

As part of our Plan to mitigate and prevent any originating robocalls, we are committed to early identification and investigation of possible robocalling conditions. Among other things, we watch for higher-than-normal subscriber traffic volume, including large bursts of traffic in small timeframes or spikes in usage. We also monitor for originating calls of short duration and low call completion percentages, originating calls with sequential called to number dialing patterns.

Zirnet Contact for Robocall Mitigation-Related Issues

The Company will update our Robocall Mitigation filings within 10 business days of any change to the information outlined in this plan. Please direct any questions related to Robocall Mitigation issues to:

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Carle Place, NY 11514
718-777-2828
paul@zirnet.com