

XIBER LLC

Robocall Mitigation Plan

This robocall mitigation plan is for XIBER LLC, with headquarters at : 1429 Chase Court Carmel, IN 46032

We perform the following roles in the call chain:

- A voice service provider with a STIR/SHAKEN implementation obligation serving end-users

XIBER LLC has not been prohibited from filing a certification in the Robocall Mitigation Database.

XIBER LLC does not have a history of enforcement actions for illegal robocalls, TCPA or TSR violations, or related state law violations.

XIBER LLC uses the following affirmative, effective measures to prevent the origination or transit of illegal robocalls.

Know Your Customer

We follow the caller ID authentication best practices for vetting caller identity and operational legitimacy for new and existing customers as described by the NANC Call Authentication Trust Anchor Working Group.

This process includes the collection and review of entity-identifying information such as :

Legal Business Name, Physical Business Address, Business Identity, Business Type, Business Industry, Business Registration ID Type, Employer Identification Number (EIN), Business Registration Number, Business Regions of Operations, Website URL , Social Media Profile URL , Authorized Representative, Email, Business Title, Job Position, Phone Number.

Traceback

We respond within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium. We cooperate fully with such entities in investigating and stopping any illegal robocallers that use our service to originate, carry, or process illegal robocalls.

Robocall Mitigation Program

Our underlying carrier Hawaii Dialogix Telecom LLC (OCN 844F) uses call analytics software provided by TransNexus to monitor all outbound voice traffic in real-time to prevent the origination or transit of illegal robocalls.

The software provides detailed reporting to identify suspected illegal robocalls. The system alerts us if we process outbound calls where the calling number has a poor reputation or is invalid, unallocated, or on a Do Not Originate list.

We immediately investigate any identified suspicious calls to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls. If we determine that the traffic was

likely unlawful, then we warn them to stop sending such traffic. If they continue to send traffic that appears to be unlawful, then we terminate their service.

Our other provider Twilio Inc. requires to set up a profile for every customer of ours in which they request :

Legal Business Name, Physical Business Address, Business Identity, Business Type, Business Industry, Business Registration ID Type, Employer Identification Number (EIN), Business Registration Number, Business Regions of Operations, Website URL , Social Media Profile URL , Authorized Representative, Email, Business Title, Job Position, Phone Number after which they approve it or not.

Twilio Inc also has the option to implement SHAKEN based on the profile which identifies the customer and monitor the calls.