

ProTelesis Robocall Mitigation Compliance

Business Information

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Overview

Since the passage of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act, the Federal Communications Commission ("FCC") has adopted a series of new rules to combat illegal robo-calling traffic. ProTelesis 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.

ProTelesis is a Voice Service Provider dedicated to stopping illegal calls from originating in its network and monitoring the calls coming into its network. ProTelesis is a "pure reseller" that has no control over the infrastructure necessary to implement STIR/SHAKEN. Because ProTelesis does not have access to the necessary infrastructure, it relies on its upstream carrier to assist in robocall mitigation. As delineated herein, ProTelesis works closely with its upstream provider to carry out the required mitigation functions.

1) Regulatory Guidance and Industry Enforcement

ProTelesis commits to respond in full within 24 hours to all traceback requests from the ITG (Industry Traceback Group), the TPTG (Traffic Pumping Traceback Group), the FCC, and law enforcement. ProTelesis shall cooperate with these groups to investigate and stop any illegal robocallers from using our service to carry or process illegal calls. When notified by the FCC's Enforcement Bureau, ProTelesis shall block and report identified illegal traffic, and any substantially similar traffic, on an ongoing basis (unless the investigation determines that the traffic is not illegal) when ProTelesis receives actual written notice of such traffic from the Enforcement Bureau. If ProTelesis determines that the identified traffic is not illegal, we shall provide the Enforcement Bureau with an explanation as to why we reasonably concluded that the identified traffic is not illegal, and what steps it took to reach that conclusion.

In the history of being a Voice Service provider, ProTelesis has not been the subject of a formal actions by law enforcement or any regulatory agency due to transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

2) Analytics for Monitoring Traffic

ProTelesis utilizes a combination of internal tools 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. This includes:

- Anomalies in cost generated by calls from a single customer
- Recent volumes versus weekly trends
- Number of unique source numbers

ProTelesis uses data systems for analytics and reviews to identify illegal robocalling in addition to a Know Your Customer (KYC) requirement. The process includes:

- Monitoring the network to identify suspicious traffic patterns via reports
- Limiting customers' capacity via concurrent session limits.
- Checking call patterns for possible abusive traffic.
- All new customers are verified with a combination of electronic and manual verification systems, references from trusted industry members, and previous experiences with customer executives and employees. ProTelesis only enables new accounts when these appropriate processes are complete.

3) Know Your Upstream Provider

ProTelesis has one upstream provider for voice traffic:

Intelepeer
1855 Griffin Rd
Suite A200
Dania Beach, FL 33004
+1 (877) 336-9171

ProTelesis has a master service agreement with its upstream provider and has received assurances in writing from its officials that it has, and will continue to, sign calls transmitted to ProTelesis, and will abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to ProTelesis. ProTelesis and its upstream provider have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

ProTelesis 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. ProTelesis 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 originating number.