

Robocall Mitigation Plan

The following policies apply to all customers and/or prospective customers of Orion Network Solutions LLC / Orion Solutions and comprise our Robocall Mitigation Plan to avoid originating illegal robocall traffic from our network:

- 1. CONTRACT REQUIREMENT:** Our agreements clearly prohibit passing illegal robocalls through our SIP networks and define precise requirements for ASR, LCD and other traffic statistics. Customers who violate these rules are subject to immediate termination without notification. If Orion believes illegal traffic has been passed through its network, the customer sending such traffic forfeits confidentiality and all data will be shared with industry partners and law enforcement as required by regulatory bodies.
- 2. CUSTOMER DISCLOSURES AND CONFIRMATION:** All customers are required to disclose certain information about their business such as physical location, contact personnel, state/country of incorporation or business formation, federal tax I.D. or non-USA government I.D. They must also disclose the practices and nature of their business. We endeavor to know the precise type of traffic which originates from each customer's SIP including the type of customers they acquire and exact type of services they provide. Orion investigates each Customer's claims to verify accuracy before accepting them as a customer.
- 3. MONITORING AND TRACEBACK:** Orion monitors its system diligently and will investigate any suspicious traffic. We act promptly when we detect traffic which appears to be robocall activity to ensure it has been pre-authorized as "legal" (i.e. authorized political, non-profit, reverse 911 or fully-opted-in traffic). In the event Orion receives a Traceback request for an illegal robocall, we act on it immediately, request a specific and detailed explanation from our customer(s) and insist on immediate corrective action. We timely respond to all Traceback request from authorities. If corrective action is not timely provided by our customer, Orion takes whatever action is necessary to prevent recurrence of the event(s).
- 4. PUBLICATION AND NOTIFICATION:** Orion publishes in the public section of its website this Robocall Mitigation Plan and further pro-actively notifies all customers of such policy along with keeping a record of such notifications.
- 5. FOREIGN SOURCES OF TRAFFIC:** Orion has non-USA customers which service their own customers and traffic that originates from both USA and Non-USA sources. We take extra precautions relative to Non-USA customers to ensure they meet all requirements of this Robocall Mitigation Plan. Prior to authorizing a foreign customer for calling privileges, we verify all information requested.
- 6. CALL BLOCKING:** Orion blocks all calls originating from numbers known to us to send illegal robocall traffic and/or calls destined to specific phone numbers as appropriate for robocall mitigation.
- 7. LAW ENFORCEMENT COOPERATION:** Orion cooperates fully with investigative authorities, industry traceback groups, the FCC and the official consortium designated to lead private traceback efforts. We have a single contact individual designated to handle all traceback requests and coordinate with outside investigations.