

Legrand Telecom LLC
Robocall Mitigation Plan
(Updated April 2024)

Introduction

This Robocall Mitigation Plan (RMP) details the reasonable steps and actions taken by Legrand Telecom LLC . (“Legrand Telecom”) to mitigate and eliminate illegal robocalling. Legrand Telecom has an ongoing commitment to identify 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.

Legrand Telecom provides business-to-business voice services. All calls that originate on its network are subject to a robocall mitigation program. All telecom services rely extensively on Legrand Telecom’s underlying providers for STIR/SHAKEN implementation and other robocall mitigation efforts. Legrand Telecom’s underlying carrier partner is Peerless.

The Company is a foreign voice service provider.

The Company does not sell services to international call originators using North American Numbering Plan Numbers.

STIR/SHAKEN Implementation

Legrand Telecom has fully implemented the STIR/SHAKEN authentication framework across the entire IP portion of its network, and all calls it originates are compliant with § 64.6301(a)(1) and (2). This compliance is by virtue of Legrand Telecom’s underlying service providers being STIR/SHAKEN compliant within the IP portions of their networks.

The Company uses a third-party vendor/underlying carrier to sign its calls and does not have its own token. Legrand Telecom does not allow its customers to spoof CallerID, so any outgoing CallerID can easily be traced back to Legrand Telecom’s customer.

The Company does not use a third-party call analytics vendor (not including analysis provided by its underlying service provider(s)).

Traceback Requests

The Company commits to respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

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, Legrand Telecom initiates blocking of all traffic from the offending customer.

The Company's point of contact to handle traceback requests is:

Name: Legrand Telecom

Title: Compliance and Information Security Officer

Department: Regulatory

Telephone Number: +1 2282889898

Email Address:

Satendra.gautam@legrandtelecom.com

Know Your Customer

Legrand Telecom has implemented Know Your Customer policies when onboarding new or renewing customers to ensure that such customers and providers do not or are not likely to engage in any prohibited conduct. The Company requires agreements to be signed by an authorized person. E911 locations are recorded for each phone number. A physical business location and local contact person is required for service with the Company.

Legrand Telecom will not activate clients that provide anonymous information or where data mismatches are found. Additionally, prospects are required to agree to Legrand Telecom's strict Acceptable Use Policies (AUP) prohibiting the act of fraudulent voice activity as a condition of doing business with Legrand Telecom.

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 Legrand Telecom as a customer and any existing customer relationships could potentially be severed.

Further, Legrand Telecom's AUP requires all customers to comply with the Telephone Consumer Protection Act and its implementing regulations, the Telemarketing Sales Rule, regulations implementing the FCC's national Do-Not-Call registry, and all other rules and regulations governing the sending of telemarketing calls and/or robocalls.

Telephone Number Validation:

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 Legrand Telecom and/or obtained by Legrand Telecom from Legrand Telecom's underlying carrier for use by the subscriber.

For subscribers with multi-line telephone systems, Legrand Telecom and its underlying provider(s) 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.

Ongoing Robocall Mitigation

Legrand Telecom monitors and examines customer traffic to detect suspicious call activity and/or calling patterns. When Legrand Telecom and/or its underlying providers detect network usage patterns consistent with illegal robocalls or suspect illegal robocalling is taking place, Legrand Telecom will immediately seek to identify the party that is originating, terminating, or routing these calls so that it may take appropriate action. The actions taken may include, but are not limited to, mining 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 (or initiate third-party blocking) the party's ability to originate, terminate, or route calls to the network; and/or providing notice to law enforcement authorities.

As part of its plan to mitigate and prevent any originating robocalls, Legrand Telecom is committed to early identification and investigation of possible robocalling conditions. Among other things, Legrand Telecom watches for higher-than-normal subscriber traffic volume, including large bursts of traffic in small timeframes or spikes in usage. Legrand Telecom also monitors for originating calls of short duration and low call completion percentages and originating calls with sequential "called to" number dialing patterns.

Updating Legrand Telecom's RMD Submission and RMP

Consistent with FCC Regulations, 47 C.F.R. § 64.6305(d)(5), (e)(5), and (f)(5), Legrand Telecom will update its submission in the RMD within 10 business days of any change to the applicable information it must provide and update in the RMD.

The Company's RMP continues to develop as the Company and the industry gain experience and deploy new robocall mitigation strategies and will be supplemented in future updates.