



Bitmax Technologies

Robocall Mitigation Plan

At Bitmax Technologies we are committed to upholding the highest standards of communication integrity and consumer protection. In accordance with the Federal Communications Commission (FCC) regulations and the Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act, we have established a robust robocall mitigation plan to prevent the transmission of illegal robocalls and spoofed calls through our network.

Our policy is to implement and maintain effective call authentication, monitoring, and blocking practices to safeguard our customers from unwanted and unlawful robocalls. We pledge to continuously evolve our strategies and technologies to combat robocall proliferation, ensuring that our mitigation efforts are effective and responsive to the changing landscape of telecommunications fraud.

Through diligent execution of this policy, Bitmax Technologies demonstrates its unwavering dedication to preserving the trust and security of our customers, while maintaining compliance with all applicable laws and regulations.

Our commitment to comply with traceback Request

Bitmax Technologies will cooperate with the FCC, law enforcement and the (ITG) on all traceback requests and investigations. We are fully committed to engaging in proactive cooperation with these entities to facilitate thorough investigations and to take decisive action against any unlawful robocall operators utilizing our services to initiate calls. This commitment underscores our resolve to uphold the integrity of our communication services and to contribute effectively to the industry-wide efforts to eradicate illegal robocall activities. To allow for timely and comprehensive law enforcement response efforts against illegal robocallers, the Provider will dedicate sufficient resources to promptly complete and provide responses to all traceback requests received from the FCC, law enforcement and/or the ITG, and commits to fully responding to any traceback request received within 24 hours after receiving the same. The Provider identifies a single point of contact for receiving all traceback requests. As part of its efforts to assist in the successful traceback of illegal robocalls, the Provider will going forward include within its carrier interconnection and/or service agreements language requiring traceback cooperation on any voice service calls exchanged. In part, these related contract provisions will specify the need for parties to promptly identify the upstream provider from which a suspected illegal robocall entered its network or the customer of the service from which the call originated.

CUSTOMER VETTING PRACTICES

As a means of preventing or minimizing the origination of illegal robocalls through its voice services, the Provider will use best practices in vetting the identity of all of its voice service subscribers, whether a residential or business subscriber). The subscriber vetting process is intended to help determine the legitimacy of a customer for the purpose of establishing a service relationship. Generally, the Provider looks to confirm the identity of customers using its voice services through collecting information such as physical customer location, contact person(s), state or country of incorporation, federal tax ID, and the nature of the customer's business. Provider efforts to vet retail and business/commercial subscribers occurs during the process of provisioning customer requested services (for example in appropriately sizing the facilities to their claimed intended use), executing the Provider's required service agreements, and granting the customer the right to use telephone number resources. Commercial end users, comprised of larger businesses with more complex service configurations, are generally recognized as presenting a higher risk of perpetrating illegal robocalls and thus those customers, at the Provider's discretion, may be subject to an additional review, including a more stringent background check and possibly a site visit. Further, with respect to meeting existing obligations to take affirmative, effective measures to prevent new and renewing customers from originating illegal calls, the Provider:

- Utilizes service agreements and acceptable use policies as a means of preventing its new and existing subscribers from using their voice and broadband services in ways that would be in violation of local, state, or federal laws, or to engage in deceptive or fraudulent activity. These documents governing use of Provider provided services include terms indicating specifically to all customers that their services should not be used for the purpose of making illegal robocalls, and the Provider reserves authority within its service agreements to suspend or terminate a subscriber's voice service for violating applicable service-related terms.
- Monitoring the network to identify suspicious traffic patterns.
- Limiting customers' capacity via call per second and/or concurrent session limits.

- Regularly checking call patterns for possible abusive traffic.

TELEPHONE NUMBER VALIDATION PRACTICES

Telephone Number Validation refers to the confirmation of the customer or end-user right to use a telephone number in connection with their subscribed voice service(s). In accord with industry best practices, the Provider has procedures in place to confirm the calling customer's right to use a telephone number. Specifically, a subscriber of the Provider's services is permitted to use a telephone number as their caller identity if a number is directly managed by the Provider and/or obtained by the Provider via an underlying partner. Further, for: (1) single line voice service subscribers, both services connected via TDM or IP, the switching equipment has been set up to only accept calls from the number assigned to that subscriber; and (2) subscribers with multi-line telephone systems, for both services connected via TDM or IP, the Provider screens all originating calls and only allows calls to be connected if the originating number matches one of the numbers assigned to the subscriber. These screening capabilities enable an automated and secure method of validating originating telephone numbers.

INTERNATIONAL CALL ORIGINATORS

The Provider is not currently an international voice services provider. If at any time the Provider does sell its services to customers which are international call originators using North American Numbering Plan resources it will familiarize itself with and develop best practices for fulling vetting such customers and performing telephone number validation on all international originated calls.

Bitmax Technologies, LLC has a dedicated upstream provider from which is receive voice traffic:

Skye Telecom LLC
DBA Skyetel
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