

Grid Communications, Inc.

Robocall Mitigation Plan

Grid Communications, Inc. (“Grid”) is committed to minimizing robocalls that originate on its network and preventing unwanted robocalls from reaching Grid customers. Grid has implemented the following Robocall Mitigation Plan as detailed in this document.

Know your Customer Procedures

Grid requires all customers to provide and maintain accurate information, including legal name and contact details and to update and verify this information as needed. Grid verifies all such information received with a variety of sources to ensure its accuracy. Grid requires all resellers to institute affirmative and effective measures to know the identity of the reseller’s customers and their right to use telephone number resources.

Know your Upstream Providers Procedures

Grid contracts with a small number of respected upstream providers. Both Grid and the providers are contractually obligated to offer service in compliance with all applicable laws and regulations, including but not limited to the law and regulations related to robocalling.

Grid only accepts public traffic from immediate upstream providers that are listed in the Robocall Mitigation Database and does not knowingly accept traffic from providers who are not listed in the Robocall Mitigation Database.

Customer Compliance / Terms of Use

Grid requires customers comply with Grid’s terms of services. Grid’s terms of services require that customer use the services in compliance with the law and prohibits, among other things, violation of any laws, automated dialing, or fax broadcasting.

Active Monitoring for Fraud

Grid monitors its network for suspicious activity including suspicious concurrent velocity, calling patterns, abusive behavior and investigate all alerts. Grid reserves the right via it’s terms of service to block customer traffic which Grid determines to be in violations of its terms of service. In the event Grid determines it is necessary to block customer traffic Grid has controls in place to do so immediately.

Traceback Requests

Grid responds to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and cooperates with such entities investigating and stopping any illegal robocalls that use our service to originate calls.