

The following policies apply to all customers and/or prospective customers of ORCAZONE ("RTSP") and comprise this Robocall Mitigation Plan to avoid originating illegal robocall traffic from the telecom network:

- 1. CONTRACT REQUIREMENT:** RTSP agreements prohibit passing illegal robocalls through any of telecom switches or 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 RTSP 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 ID or non-USA government ID. Customers must also disclose the practices and nature of their business. RTSP endeavors to know the precise type of traffic which originates from each customer's switch including the type of customers acquired and exact type of services provided. RTSP investigates each Customer's claims to verify accuracy before accepting them as a customer.
- 3. MONITORING AND TRACEBACK:** RTSP monitors its system diligently and will investigate any suspicious traffic. RTSP acts promptly when detected traffic 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 RTSP receives a Traceback request for an illegal robocall, RTSP acts on it, requesting a specific and detailed explanation from customer(s) and insist on immediate corrective action. RTSP timely responds to all Traceback request from authorities. If corrective action is not timely provided by the customer, RTSP takes whatever action is necessary to prevent recurrence of the event(s).
- 4. PUBLICATION AND NOTIFICATION:** RTSP 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:** RTSP has non-USA customers which service their own customers and traffic that originates from both USA and Non-USA sources. RTSP takes extra precautions relative to non-USA customers to ensure compliance with all requirements of this Robocall Mitigation Plan. Prior to authorizing a foreign customer for calling privileges, RTSP verifies information requested.
- 6. ROBOCALL MITIGATION DATABASE:** No later than January 1, 2024, RTSP will require all its wholesale customers to be registered with the Robocall Mitigation Database. Wholesale customers not registered with this database will not be allowed access to the RTSP network.
- 7. CALL BLOCKING:** RTSP 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.
- 8. LAW ENFORCEMENT COOPERATION:** RTSP cooperates fully with investigative authorities, industry traceback groups, the FCC and the official consortium designated to lead private traceback efforts. RTSP has a single contact individual designated to handle all traceback requests and coordinate with outside investigations.