

Tritone Technology LLC dba Netacom Robocall Mitigation Plan

The following outlines the steps taken by Tritone Technology LLC dba Netacom ("NETACOM") to prevent originating illegal robocall traffic as part of its robocall mitigation program:

Prohibition of Illegal Robocalls: NETACOM explicitly prohibits all clients from originating illegal robocalls. This prohibition is clearly communicated in our service agreements. Any violation results in an immediate suspension of services pending review and remediation.

Caller ID Verification:

- NETACOM ensures that Caller ID information matches numbers within our control.
- Exceptions to this policy must be formally requested, reviewed, and documented. As of now, no exceptions are in place.

Incident Response Plan for Illegal Robocalls:

- Upon detection of a potential illegal robocall, NETACOM identifies the call details and traces its origin through our systems.
- Actions include:
 - Identifying and mitigating any vulnerabilities in client networks or systems.
 - Suspending voice traffic from offending clients or systems, if necessary.
 - Findings are fully communicated to relevant parties, including upstream and downstream providers, as appropriate.

International Dialing Controls:

- International dialing is restricted and controlled via:
- Limiting the quantity of calls.
- Requiring per-client or per-system PIN entry.
- Enabling international dialing only upon explicit client request.

STIR/SHAKEN Compliance:

- All upstream and downstream providers involved in our call processing are fully STIR/SHAKEN compliant:
 - **Broadcom** (RMD0002564)
 - **Commio** (RMD0005575)

Blacklist and Whitelist Usage:

- NETACOM employs inbound and outbound blacklists and whitelists to block unwanted or unauthorized sources and destinations of call traffic.

Traceback Cooperation:

- NETACOM cooperates fully with any investigative body, including law enforcement, the FCC, and the Industry Traceback Group (ITG).
- A designated point of contact is responsible for handling traceback requests and coordinating with external investigations.

By adhering to these policies and processes, NETACOM ensures robust compliance with FCC regulations and industry standards for robocall mitigation.