

Magna5 MS LLC
Robocall Mitigation Plan

Introduction

This document details the reasonable steps and actions taken by Magna5 MS LLC (“Magna5 MS”) to mitigate and eliminate illegal robocalling. Magna5 MS has an ongoing commitment to scan for 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.

Magna5 MS is a managed service provider who also provides Interconnected Voice over Internet Protocol (“VoIP”) calling services. All telecom services are provided on a resale-only basis. As a telecom reseller, Magna5 MS is dependent on our underlying provider’s assistance with monitoring their networks for fraudulent voice calling patterns.

Know Your Underlying Provider

Magna5 MS LLC has master service agreements with our upstream providers and has received written assurances from their officials that it has and will continue to sign calls submitted to Magna5 MS LLC and will abide by the FCC’s STIR/SHAKEN and robocall mitigation rules in all respects when providing voice services to Magna5 MS. Magna5 MS and its upstream providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Know Your Customer

Screening interviews are performed to understand potential customer business models and the potential, or lack thereof, for involvement in fraudulent robocalling schemes.

In our research of the prospect, Magna5 MS will not activate clients that provide anonymous information or where data mismatches are found. Additionally, prospects are required to agree to Magna5 MS’s strict policies and contractual terms prohibiting the act of fraudulent voice activity as a condition of doing business with Magna5 MS.

Individuals associated with 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 Magna5 MS as a customer and any existing customer relationships could potentially be severed.

Traceback Requests

Magna5 MS is committed and will respond fully within 24 hours to all Traceback Requests from the FCC, law enforcement agencies, and the industry traceback consortium and vows to cooperate with these agencies in investigating and stopping any illegal robocallers that use our service to make calls. Magna5 MS will devote sufficient resources to provide prompt and complete information to traceback requests. Our point of contact to handle all traceback requests is:

Justin Cameron, CTO

traceback@magna5.com

412-773-7838

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, Magna5 MS immediately begins rejecting all traffic from the offending customer.

Telephone Numbers

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 Magna5 MS and/or obtained by Magna5 MS from Magna5 MS’s underlying carrier for use by the subscriber. Numbers can also be allocated by Magna5 MS or ported using information from previous bill matching customer information.

For subscribers with multi-line telephone systems, Magna5 MS and our underlying provider 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.

International Calling

Magna5 MS is not currently an international voice services provider. If at any time Magna5 MS does decide to sell our services to international customers using North American Numbering Plan resources, we will familiarize ourselves with and develop best practices for full vetting of such customers and work with our underlying provider to perform the necessary telephone number validation on all international originated calls.

Call Analytics

As a reseller, Magna5 MS must rely on our underlying provider and/or their third-party vendors to determine if originating calls should be blocked based on call analytics practices.

Ongoing Robocall Mitigation

When Magna5 MS receives notifications from our carriers, we investigate the incident, and if confirmed, we shut down the traffic.

Magna5 MS Contact for Robocall Mitigation-Related Issues

The Company will update our Robocall Mitigation filings within 10 business days of any change to the information outlined in this plan. Please direct any questions related to Robocall Mitigation issues to:

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412-773-7838