

Robocall Mitigation Program

Macrotel Italia S.r.l. is committed to protecting our customers against illegal robocalls on our network. As detailed below, Macrotel Italia S.r.l. has taken specific reasonable steps to avoid, the origination, carrying, or processing of illegal robocall traffic. Macrotel Italia S.r.l. reserves the right to modify and/or supplement this Robocall Mitigation Plan to adapt to risks and to improve the overall effectiveness of our program.

Macrotel Italia S.r.l. has implemented know-your-customer and specific reasonable steps, including traffic monitoring, to mitigate the risk of carrying or processing illegal robocalls on behalf of our customers. As a reseller, Macrotel Italia S.r.l. relies on MOR-Kolmisoft call analytics to monitor call traffic. MOR-Kolmisoft has implemented its own call analytics to identify unlawful traffic originated by its retail customers and the end users of its wholesale customers' services. MOR-Kolmisoft's call analytics can detect call patterns that indicate robocall activity, including, but not necessarily limited to, an unusually large number of calls from the same number, an excessive number of short duration calls, and calls that stop attempting to connect after a single ring. MOR-Kolmisoft's call analytics also can detect whether the calling number is invalid, unallocated, or on Industry Traceback Group's Do Not Originate (DNO) list.

Macrotel Italia S.r.l. does not send voice traffic directly to the USA, but through already FCC registered and therefore adopting the necessary measures provided for by their declaration:

"In accordance with FCC 47 CFR 64.6305 we have the following steps in place

** A description of "reasonable steps" taken to comply with regulations*

**** We are no longer taking on any new customers all traffic will originate from existing customers*

** Specific steps to mitigate illegal robocalls*

**** All customers have had their access to CA/US market closed until such time they registered with the FCC RMD database, we monitor closely short duration low ACD/ASR traffic*

** Procedures for "know your customer" and "know your upstream provider"*

**** All customers are required to provide their details*

** A description of any call analytics system used to identify and block illegal traffic*

**** We operate a DNO system & work closely with ITG 'IF' required*

** How to prevent new and nonrenewing customers from originating illegal calls*

**** We have 3rd party software which identifies linked accounts where they are attempting to hide true identity, we also use banking software to identify links*

** A commitment to respond within 24 hours to all traceback requests*

**** We do not operate a 24/7 compliance support team service but we commit to a reply within the earliest timely period*

** A commitment to cooperate with entities that investigate and stop illegal robocallers*

**** We have always prided ourselves in our commitment to law enforcement..."*

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