

Robocall Mitigation Plan

The following policies apply to all customers and/or prospective customers of Tianhong Commercial and constitute our robocall mitigation plan to avoid illegal robocall traffic originating from our network:

1. **Contractual Requirements:** Our agreements explicitly prohibit the passage of illegal robocalls through any of our switches or networks and define precise requirements for ASR, LCD and other traffic statistics. Customers violating these rules will be terminated immediately without notice. If Tianhong Commercial believes that illegal traffic has passed through its network, the customer sending such traffic will lose confidentiality and all data will be shared with industry partners and law enforcement as required by regulators.
2. **Customer Disclosure and Acknowledgement:** All customers are required to disclose certain information about their business, such as physical location, contact person, state/country of incorporation or business formation, federal tax ID or non-US government ID. They must also disclose the practices and nature of their business. We work hard to understand the exact type of traffic generated by each customer switch, including the types of customers they acquire and the types of services they provide. Tianhong Commercial investigates the accuracy of each customer's claim before accepting it.
3. **Monitoring and Traceback:** Tianhong Commercial carefully monitors its systems and will investigate any suspicious traffic. When we detect traffic that appears to be robocall activity, we take immediate action to ensure it has been pre-authorized as "legitimate" (i.e. authorized political, non-profit, reverse 911, or fully opt-in traffic). If Tianhong Business receives a traceback request for an illegal robocall, we take immediate action to require a specific and detailed explanation from the customer and insist on immediate corrective action. We respond promptly to all traceback requests from authorities. If our customers do not take timely corrective action, Tianhong Business will take all necessary steps to prevent the incident from recurring.
4. **Publication and Notification:** Tianhong Business publishes this robocall mitigation program on the public portion of its website and further proactively notifies all customers of this policy while maintaining a record of such notifications.
5. **Foreign Traffic Sources:** Tianhong Business has non-U.S. customers that provide services to its own customers, with traffic coming from both U.S. and non-U.S. sources. We take extra precautions with non-U.S. customers to ensure they meet all requirements of this robocall mitigation program. We verify all requested information before authorizing foreign customers for calling privileges.
6. **Robocall Mitigation Database:** No later than August 28, 2021, Tianhong Commercial LLC will require all of its wholesale customers to register in the Robocall Mitigation Database. Wholesale customers that are not registered in this database will not be allowed access to our network.
7. **Call Blocking:** Tianhong Commercial will block all calls from numbers we know to be sending illegal robocall traffic and/or calls to specific phone numbers to appropriately mitigate robocalls.
8. **Law Enforcement Cooperation:** Tianhong Commercial fully cooperates with investigative agencies, industry traceback organizations, the FCC, and official consortiums designated to lead private traceback efforts. We have a designated contact person to handle all traceback requests and coordinate external investigations.

