

Robocall Mitigation Plan for VoIP Logistics, LLC Inc.

VoIP Logistics, LLC Inc. (VoIP Logistics, LLC) is a new and current active participant and influencer in the key industry organizations and efforts to stop illegal robocalling. VoIP Logistics, LLC believes that all consumers will benefit to the greatest degree when carriers and service providers can accurately identify illegal robocalls while simultaneously ensuring that valid communications are not improperly affected. Ensuring that the prevention of illegal robocall coexists with effective traffic delivery of legal calls across the global communications ecosystem will depend critically upon the effective use of multi-faceted tools like the RMD together with other industry best practices and the increased adoption of SHAKEN/STIR specifications. A large majority of VoIP Logistics, LLC's traffic and services are supported in its capacity as an Intermediate Service Provider without direct end-user relationships. In a similar role, VoIP Logistics, LLC may also from time to time operate in the role of an International Gateway Provider, albeit at considerably smaller volumes than its domestic Intermediate provider capacity. VoIP Logistics, LLC also operates as a Voice Service Provider with its relatively small but growing retail enterprise focused business where it may directly enable and support direct-to-consumer services. VoIP Logistics, LLC's fraud operations manage all of these combined roles and responsibilities collectively but with a clear understanding of the differences that require different operational systems, tools and supporting process and procedure. For example, VoIP Logistics, LLC's VSP enterprise focused services include the ability to incorporate a variety of tools to ensure robust consumer protections are in place, such as voice recognition, real-time "robo-scoring", opt-in or opt-out among others that are designed to help avoid the delivery and receipt of illegal robocalls. While more generally, VoIP Logistics, LLC also actively supports research efforts that are specifically designed to help develop robocalling data and solutions for call authentication and analytics to stop the transmission of illegal robocalling on its network and for the industry collectively. Across all of its service provider roles VoIP Logistics, LLC continues to have fraud mitigation success with its three-pronged operational approach (prevent, detect, and mitigate) that incorporate FCC mandates and industry best practices for each of its roles as described more fully below.

TECHNICAL AND OPERATIONAL FOUNDATIONS OF VoIP Logistics, LLC'S PLAN FOR ALL OF ITS DISCRETE SERVICE PROVIDER ROLES

VoIP Logistics, LLC's Robocall Mitigation Plan is premised upon a three-pronged set of technical and operational procedures, the details of which can be summarized as follows:

1) Prevention: VoIP Logistics, LLC has a stringent on-boarding screening process designed to proactively identify and prevent those that may engage in illegal robocalling from becoming VoIP Logistics, LLC customers at the outset. On-boarding screening procedures will always take VoIP Logistics, LLC's specific service provider role into account but the fundamentals of its on-boarding review procedures apply to all of VoIP Logistics, LLC's Intermediate, International Gateway and VSP services alike and we consider them to be the core of our "Know Your Customer" practices, which also inherently include

“Know Your Upstream Provider” now in the context of the Commission’s updated rules and terminology in wholesale service model scenarios (collectively “KYC”). VoIP Logistics, LLC tracks and records government enforcement actions and ever evolving industry trends to have up-to-date information on problematic use cases and known bad actors. Accordingly, VoIP Logistics, LLC requires that all of its upstream service providers (who may themselves be “Intermediate Providers”, “Gateway Providers”, “Originating Voice Service Providers” or “Foreign Service Providers”) customers maintain valid registrations in the FCC’s Robocall Mitigation Database (“RMD”) and requires clear service-specific contractual requirements in which customers agree to cooperate with the ITG and agree to follow all applicable laws against illegal robocalling, fraud and abuse. After our initial “KYC” on-boarding screening, VoIP Logistics, LLC’s operations personnel stay closely aligned with its customers and the industry’s anti-robocalling efforts and developments to remind, educate and clarify what behaviors may signal or constitute unlawful robocalling, and continually notify customers when we identify instances that need their attention in order to prevent illegal robocalling behaviors on their networks.

2) Monitoring and Detection: VoIP Logistics, LLC has a team of operational experts who have implemented technical and operational processes and procedures to monitor, detect and analyze the use of its services and traffic on our network that helps to determine when illegal and inappropriate robocalling activity may be occurring. VoIP Logistics, LLC has developed and deployed a “Call Blocking Tool” that incorporates industry best practices into its core network to identify and block invalid, unallocated and otherwise obviously illegal telephone numbers. Further, even though it acts predominantly as an “Intermediate Provider”, VoIP Logistics, LLC implemented STIR/SHAKEN in its all-IP core network infrastructure long before it was mandated by the FCC and has been working to increase call detail transparency and collaborative traceback enablement for years. When unlawful robocall campaigns are detected, VoIP Logistics, LLC follows established processes and procedures to notify upstream customers of the problematic traffic and request that they take immediate corrective actions to prevent reoccurrence of the illegal calls. VoIP Logistics, LLC’s engagement and support for the ITG Tracebacks also includes work to monitor that its upstream providers are effectively cooperating with the ITG and working to address the sources of each traceback event. VoIP Logistics, LLC consistently analyzes its call detail records to identify problematic call patterns and their sources from where it sits in a myriad of traffic flows. VoIP Logistics, LLC then incorporates these learnings into its traffic data analytics and detection technologies to continually improve its capabilities to accurately detect suspected illegal activity and deploy mitigation measures.

3) Mitigation: VoIP Logistics, LLC’s operations personnel are positioned to rapidly assist the ITG with the industry’s collective efforts to identify the originating sources of illegal activities on the PSTN and prevent further delivery of unwanted and illegal traffic to the greatest degree possible. VoIP Logistics, LLC tracks its ITG request data and conducts considerable outreach to upstream customers that have sent traceback traffic to

VoIP Logistics, LLC. VoIP Logistics, LLC's upstream provider mitigation efforts aim to achieve demonstrable improvements in call quality, while also accounting for call quantities that are being serviced as well. When necessary and appropriate, VoIP Logistics, LLC can formally demand customers be put on a performance improvement plan, or if past mitigation efforts have failed, VoIP Logistics, LLC does take corrective action to terminate service arrangements that place VoIP Logistics, LLC and downstream providers and consumers at risk. VoIP Logistics, LLC's commitment to the benefits of STIR/SHAKEN in an all-IP network environment advances improvements in accurate and targeted call blocking that are designed to block calls from invalid and illegal telephone numbers in keeping with industry best practices and the FCC's recommendations, while simultaneously work to prevent anti-competitive and discriminatory blocking and mislabeling that is unfortunately plaguing the competitive industry with overly broad and blunt analytics. VoIP Logistics, LLC also works closely with Law Enforcement Agencies (LEA) at all levels of government and with its interconnected carrier partners. VoIP Logistics, LLC's fraud and security experts are constantly working to respond to complaints and trouble tickets with customers that may be associated with the unlawful uses of VoIP Logistics, LLC's services. In addition to these notifications, we then aim to work diligently together with our customers and other industry members to stop the unlawful robocall campaigns being detected. Finally, together with its active involvement in the ITG, VoIP Logistics, LLC supports the industry's established Do Not Originate (DNO) efforts pursuant to the industry best practices and procedures.

AFFILIATED ENTITIES COVERED BY VoIP Logistics, LLC'S ROBOCALLING MITIGATION PLAN:

VoIP Logistics, LLC is the sole owner and operator of its underlying VoIP Logistics, LLC carrier VoIP Logistics, LLC.com which is managed together and in accordance with this Robocall Mitigation Plan. Further, in April 2025 VoIP Logistics, LLC acquired Voxbone S.A. and while VoIP Logistics, LLC continues to work to fully integrate all of its operational capabilities.: