

Tovtel Robocall Mitigation Plan.

This document details the reasonable steps taken by Tovtel to mitigate and eliminate illegal robocalling. Tovtel 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 combating fraudulent voice activity

Know Your Underlying Provider

Tovtel has 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 Tovtel and will abide by the FCC's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice services to Tovtel. Tovtel 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.

Traceback Requests

Tovtel 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. Tovtel will devote sufficient resources to provide prompt and complete information to traceback requests.

Ongoing Robocall Mitigation

Tovtel monitors and examines call detail records (CDRs) on a repeating basis to detect suspicious call activity and/or calling patterns. When we and/or our underlying provider detect network usage patterns consistent with illegal robocalls or suspect illegal robocalling is taking place, we will immediately seek to identify the party that is originating, terminating, or routing these calls so that we may take appropriate action.