

Robocall Mitigation Plan

The following policies apply to all customers and/or prospective customers of Nilram Management LLC and provider partner Voip Innovations.

Robocall Mitigation Plan to avoid originating illegal robocall traffic from our PBX Switch:

1. CONTRACT REQUIREMENT: Our agreements clearly prohibit passing illegal robocalls through any of our PBX switches or

networks and define precise requirements for ASR, LCD and other traffic statistics. Customers who violate these

rules are subject to immediate termination without notification. If Nilram management believes illegal traffic has been

passed through its PBX, the customer sending such traffic forfeits confidentiality and all data will be shared

with industry partners and law enforcement as required by regulatory bodies.

2. CUSTOMER DISCLOSURES AND CONFIRMATION: All customers are required to disclose certain information about their

business such as physical location, contact personnel, state/country of incorporation or business formation,

federal tax I.D. or non-USA government I.D. They must also disclose the practices and nature of their business. We

endeavor to know the precise type of traffic which originates from each customer's switch including the type of

customers they acquire and exact type of services they provide. Nilram management investigates each Customer's

claims to verify accuracy before accepting them as a customer.

3. MONITORING AND TRACEBACK: Nilram Management along with Voip Innovations monitors its system diligently and will investigate any suspicious

traffic. We act promptly when we detect traffic which appears to be robocall activity to ensure it has been preauthorized as "legal" (i.e. authorized political, non-profit, reverse 911 or fully-opted-in traffic). In the event

Nilram Management receives a Traceback request for an illegal robocall, we act on it immediately, request a specific

and detailed explanation from our customer(s) and insist on immediate corrective action. We timely respond to all

Traceback request from authorities. If corrective action is not timely provided by our customer, Nilram management and Voip innovations

takes whatever action is necessary to prevent recurrence of the event(s).

4. PUBLICATION AND NOTIFICATION: Voip innovations publishes in the public section of its website this Robocall

Mitigation Plan and further pro-actively notifies all customers of such policy along with keeping a record of such

notifications.

5. FOREIGN SOURCES OF TRAFFIC: Voip Innovations has non-USA customers which service their own customers and

traffic that originates from both USA and Non-USA sources. We take extra precautions relative to Non-USA

customers to ensure they meet all requirements of this Robocall Mitigation Plan. Prior to authorizing a foreign

customer for calling privileges, we verify all information requested.

6. CALL BLOCKING: Voip Innovations blocks all calls originating from numbers known to us to send illegal robocall

traffic and/or calls destined to specific phone numbers as appropriate for robocall mitigation.

7. LAW ENFORCEMENT COOPERATION: Nilram Management and Voip innovations cooperates fully with investigative authorities, industry

traceback groups, the FCC and the official consortium designated to lead private traceback efforts. We have a

single contact individual designated to handle all traceback requests and coordinate with outside investigations.