

****Robocall Mitigation Program Description****

Cool Telecom has implemented a robust robocall mitigation program as part of its commitment to combat illegal robocalls and protect end users. Although full STIR/SHAKEN implementation is in progress, the company applies the following mitigation techniques on all calls originating on its network:

1. **Know Your Customer (KYC) Procedures**

- Cool Telecom performs due diligence and identity verification for all new customers.
- We validate corporate documentation, contact information, and traffic profiles before enabling outbound calling services.

2. **Traffic Monitoring**

- We continuously monitor call traffic patterns to detect anomalies (e.g., high call volume to invalid numbers, short-duration calls).
- Suspicious traffic is automatically flagged and reviewed by our fraud prevention team.

3. **Call Blocking and Rate Limiting**

- Calls to known fraud-prone destinations and patterns are blocked or rate-limited.
- We maintain and update blacklists based on internal data and industry intelligence.

4. **Traceback Cooperation**

- Cool Telecom fully cooperates with traceback requests from USTelecom's Industry Traceback Group (ITG) and other authorities.
- We respond promptly to all formal traceback investigations.

5. **Customer Accountability**

- Any customer found to be originating unlawful robocalls is suspended or terminated.
- We include anti-robocall clauses in our service agreements.

Cool Telecom is committed to maintaining compliance with FCC rules and working collaboratively with the industry to eliminate unlawful robocalls.

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