

ROBOCALL MITIGATION PROGRAM

We, as voice service provider (defined under [47 CFR 54.500](#) Terms and Definitions) including a foreign voice service provider (defined under [47 CFR 64.6300](#) (c) Definitions) and non-gateway intermediate provider (defined under [47 CFR 64.6300](#) Definitions) confirm that we have implemented an appropriate robocall mitigation program (as outlined in [47 CFR 64.6305](#) Robocall mitigation and certification). This program includes taking reasonable steps to avoid originating, carrying or processing illegal robocall traffic and we also commit to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperating with such entities in investigating and stopping any illegal robocallers that use our service to originate, carry or process calls.

Certification in the Robocall Mitigation Database

With respect to to 47 CFR 64.6305 (d) (1) and 47 CFR 64.6305 (f) (1), we have not implemented the STIR/SHAKEN authentication framework on any portion of our network, for carrying or processing calls.

With respect to 47 CFR 64.6305 (d) (2) (i) and 47 CFR 64.6305 (f) (2) (i), we state that we are a foreign voice service provider and foreign non-gateway intermediate provider. Our calls are managed by various network providers, as we are a reseller. As a result, we are unable to implement STIR/SHAKEN.

With respect to 47 CFR 64.6305 (d) (2) (ii) and 47 CFR 64.6305 (f) (2) (ii), we rely on our underlying network carrier to detect and prevent illegal robocalls originating from our customers' telephone numbers. We take affirmative, effective measures to ensure new and renewing customers do not use our network for illegal activity, including verifying customer identity through physical address checks, credit card verification, and other due diligence. We will coordinate with our service provider to obtain any requested information and comply with authorities' directives, including suspending or restricting service on numbers involved in illegal activities.

Our customer vetting process involves collecting details such as physical location, contact persons, business type, state or country of incorporation, and federal tax ID to confirm the legitimacy of each customer—whether residential or commercial. For larger or more complex business customers, additional reviews, including background checks and site visits, may be conducted to mitigate risks of illegal robocalling.

We also include contractual stipulations that prohibit the use of our voice services for illegal activities. Our service agreements and acceptable use policies explicitly state that services must not be used for making illegal robocalls or engaging in fraudulent or deceptive conduct. We reserve

the right to suspend or terminate service if a customer violates these terms, helping to prevent misuse of our services for illegal purposes.

As part of its Plan to mitigate and prevent any originating robocalls on its network, the Provider is committed to early identification and investigation of possible robocalling situations. In monitoring usage of its network, particular attention is given to: (1) higher than normal subscriber traffic volume including large bursts of traffic in small timeframes or inconsistent volumes of traffic (spikes in usage); (2) originating calls of short duration and low call completion percentages; (3) originating calls with sequential called to number dialing patterns; (4) repeated calls made to do-not-call registry or invalid numbers; and (5) calls to NPA-NXXs not assigned by the North American Numbering Plan Administrator. Our agreements clearly prohibit passing illegal robocalls through any of our 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.

With respect to 47 CFR 64.6305 (d) (2) (iii) and 47 CFR 64.6305 (f) (2) (iii), we commit to responding within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium. Additionally, we will cooperate fully with these entities in investigating and stopping any illegal robocallers that use our service to originate calls. Our designated contact for such requests is:

Name: Gurrattan Kaur

Title: Founder & CEO

Phone No: (902)-790-9156

Email: Management@scotialabs.com

With respect to 47 CFR 64.6305 (d) (2) (iv) and 47 CFR 64.6305 (f) (2) (iv), we state that, at any time, in the prior two years, we as filing entity (and/or any entity for which the filing entity shares common ownership, management, directors, or control) has not been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

With respect to 47 CFR 64.6305 (d) (3) and 47 CFR 64.6305 (f) (3), we state that all certifications made pursuant to paragraphs 47 CFR 64.6305 (d)(1) and (2) and 47 CFR 64.6305 (f)(1) and (2) have been filed in the appropriate portal on the Commission's website.

With respect to 47 CFR 64.6305 (d) (4) and 47 CFR 64.6305 (f) (4), we have provided the necessary business and contact details through the designated portal on the Commission's website.

With respect to 47 CFR 64.6305 (d) (5) and 47 CFR 64.6305 (f) (5), we state that we will update our filings within 10 business days of any change to the information we must provide pursuant to 47 CFR 64.6305 paragraphs (d)(1) through (4) and paragraphs (f)(1) through (4).

Intermediate provider and voice service provider obligations

With respect to 47 CFR 64.6305 (g) (Intermediate provider and voice service provider obligations), we state that

1. We will accept calls directly from a domestic voice service provider only if that voice service provider's filing appears in the Robocall Mitigation Database in accordance with 47 CFR 64.6305 paragraph (d) and that filing has not been de-listed pursuant to an enforcement action.
2. We will accept calls directly from a foreign voice service provider or foreign intermediate provider that uses North American Numbering Plan resources that pertain to the United States in the caller ID field to send voice traffic to residential or business subscribers in the United States, only if that foreign provider's filing appears in the Robocall Mitigation Database in accordance with 47 CFR 64.6305 paragraph (d) and that filing has not been de-listed pursuant to an enforcement action.
3. We will accept calls directly from a gateway provider only if that gateway provider's filing appears in the Robocall Mitigation Database in accordance 47 CFR 64.6305 paragraph (e), showing that the gateway provider has affirmatively submitted the filing, and that filing has not been de-listed pursuant to an enforcement action.
4. We will accept calls directly from a non-gateway intermediate provider only if that non-gateway intermediate provider's filing appears in the Robocall Mitigation Database in accordance with 47 CFR 64.6305 paragraph (f), showing that the non-gateway intermediate provider affirmatively submitted the filing, and that filing has not been de-listed pursuant to an enforcement action.
5. We will not block a voice call under any circumstances if the call is an emergency call placed to 911; and we will make all reasonable efforts to ensure that we do not block any calls from public safety answering points and government emergency numbers.