

Robocall Mitigation Policy

Robocall Mitigation Compliance with TRACED Act

<u>Date</u>	<u>On behalf of</u>	<u>Change Summary</u>
8/29/2025	Netvata, LLC	Initial Version 1.1

Objective: Establish and follow a policy that is compliant with TRACED Act

I. Overview

The FCC requires that all providers certify in the FCC Robocall Mitigation Database their status for compliance with STIR/SHAKEN. Those not yet fully compliant must implement and certify to the implementation of a Robocall Mitigation Plan to ensure that this illegal traffic does not originate on their networks as they work within the industry to become fully compliant.

The Commission requires voice service providers to develop a Robocall Mitigation Plan that:

- details the reasonable steps taken to avoid originating illegal robocalls.
- demonstrates a commitment to respond to traceback requests to cooperate with investigating and stopping illegal robocalls.
- is filed in the Robocall Mitigation Database.

This mitigation plan is submitted on behalf of NETVATA, LLC (NETVATA), which provides services nationally.

NETVATA has worked with our selected providers/gateways over many years and they are trusted providers as an Authorized Service Provider in the FCC database.

II. General Prohibition Against Illegal Robocalling

NETVATA end user services are subject to restrictions contained in its published legal notices and all executed services orders include the requirement that service is provided pursuant to its terms of service ("TOS") requirements.

Our existing TOS prohibit activities normally associated with Robocalling including, but not limited to:

- The Existing TOS prohibit activities normally associated with Robocalling including, but not limited to: providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- Violating any applicable local, state, or federal law; using the NETVATA service to engage in or in connection with fraudulent activities

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In addition, the company is updating its TOS to expressly reference the prohibition on robocalling and all current subscribers will receive notice of the publication of its updated TOS.

NETVATA's end users are notified that NETVATA may take action up to suspension or termination of service for violation of the TOS.

III. Knowing Our Customer

NETVATA utilizes the mitigation technique of "Knowing Our Customer." NETVATA is a small, established provider that maintains a close relationship with its customers. Our customers are generally small businesses and few have enough call paths to generate the high volume of traffic associated with robocalling allowing us to use targeted in-house analytics to monitor, alert and apprehend suspected robocalling activities.

NETVATA has set a call path level based on its average customer size, the level — referred to as "large volume calling capability" — is subject to change.

NETVATA screens for new customers requesting service at or above large volume calling capability levels:

- We will not deploy large volume calling capability as a residential service or at an address shown in the company records as being residential.
- Businesses requesting large volume calling capability must provide a tax ID and verification as to the nature of the business.
- We verify addresses to look for overlapping / multiple deployed voice path subscriptions.
- A NETVATA representative may visit the premise of the business to verify the number of users at the location is appropriate for the volume of calling.
- NETVATA ensures that the caller-ids for each DID/line are set during customer configuration.
- NETVATA selects the DID for any new customers, or if the customer is porting DIDs to us, those DIDs will be the only ones configured in our system for that customer.
- Customers do not have any write access to the PBX except for their voicemails and voicemail greetings.
- Any changes to service must come through our call center and a ticket created so we have an audit log of any changes made for the customer.

NETVATA serves a small number of long-time business end users with the potential for large volume calling capability. They are being directly contacted to review NETVATA's policies and efforts to prevent the NETVATA network from being used for illegal robocalling.

IV. Network Monitoring

NETVATA works with our PBX software provider for updates to any software that allows for real-time monitoring of traffic and will flag call patterns indicative of potential illegal robocalling. Additional capability added to the software which will automatically disable any subscribers associated with flagged call patterns, will be installed on our system.

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V. Traceback and Enforcement Cooperation

NETVATA will actively cooperate with the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG) to investigate and stop illegal robocalls. NETVATA will dedicate sufficient resources to provide prompt and complete responses to traceback requests.