



Tech Samurai Consulting LLC Robocall Mitigation Plan

Tech Samurai Consulting LLC (“Tech Samurai”) is committed to cooperating with the Federal Communications Commission, law enforcement, and the industry traceback consortium in investigating and stopping illegal robocallers that it learns are using our service to originate calls into the United States.

It is Tech Samurai’s understanding that its Upstream Provider (see Appendix A) have implemented STIR/SHAKEN.

Tech Samurai, through its Upstream Provider, commits to fully responding within 24 hours to all traceback requests from the ITG, the TPTG, the FCC, and law enforcement. Tech Samurai shall cooperate with these groups to investigate and stop any illegal robocallers from using Tech Samurai’s service to carry or process illegal calls. When notified by the FCC’s Enforcement Bureau, Tech Samurai shall take measures to block and report identified illegal traffic, and any substantially similar traffic, on an ongoing basis (unless Tech Samurai’s investigation determines that the traffic is not illegal) when Tech Samurai receives actual written notice of such traffic from the Enforcement Bureau. If Tech Samurai determines that the identified traffic is not illegal, Tech Samurai shall provide the Enforcement Bureau with an explanation as to why Tech Samurai (or its Upstream Provider) reasonably concluded that the identified traffic is not illegal, and what steps it took to reach that conclusion.

Tech Samurai, through its Upstream Provider, utilizes a combination of internal tools and third-party solutions to check for Do Not Originate (DNO) numbers. In addition, Tech Samurai and/or its Upstream Provider utilize a combination of internal tools and third-party solutions to detect invalid phone number formats, area codes and unassigned number blocks. Tech Samurai and/or its Upstream Provider also utilizes data analytics to detect and investigate irregular and unexpected calling patterns, originating number use against customer profiles.

Tech Samurai and/or its Upstream Provider uses data systems for analytics and reviews to identify illegal robocalling in addition to a Know Your Customer (KYC) requirements to access Tech Samurai’s networks. The process includes:

- Monitoring the network to identify suspicious traffic patterns.
- Limiting customers’ capacity via call per second and/or concurrent sessions limits
- Regularly checking call patterns for possible abusive traffic

All new customers are verified with a combination of electronic and manual verification systems, credit reviews, references from trusted industry members, and previous experiences with customer executives and employees. Tech Samurai and its Upstream Provider severely limits the capabilities of new accounts until these processes are completed.

Tech Samurai reserves the right to refuse traffic from any party at any time where robocalling or use of originating numbers that are not valid or they are not authorized to use has occurred or is suspected. Tech Samurai and/or its Upstream Provider is able to block the originating number(s),



terminating number(s), trunk(s), or customer including termination of customer relationship to prevent robocalling, invalid originating number or spoofed originating number transiting Tech Samurai's networks.

Tech Samurai Consulting LLC

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Appendix A – Upstream Provider

CoreDial LLC / SkySwitch
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Blue Bell, PA 19422