

FULTON COMMUNICATIONS, INC. DBA VERTICAL COMMUNICATIONS ROBOCALL MITIGATION PLAN

Pursuant to 47 C.F.R. § 64.6305, Fulton Communications, Inc. dba Vertical Communications (“Fulton”, “Vertical Communications”, “the Company”) submits this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls.

This report describes the practices and procedures which Vertical Communications has in place to protect its business customers and to mitigate illegal robocalls. Vertical Communications may modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time in order to respond to changes in its business, its capabilities and its needs.

Vertical Communications has not been prohibited from filing in the Robocall Mitigation Database pursuant to a law enforcement action, and none of its prior certifications have been removed from the Database by the Commission.

Vertical Communications has not been, at any time in the prior two years, the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with the Company’s findings of actual or suspected wrongdoing due to it transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

Fulton Communications, Inc. dba Vertical Communications is a Managed Service Provider based in Georgia focused on supporting businesses. As a Manager Service Provider the Company provides multiple products and services to its customers along with telecommunications products and services.

The company is reliant upon its underlying carriers who provision the platform and services which the Company uses in order to support its business customers with telecommunications products and services. The Company serves as a switchless reseller.

Fulton Communications, Inc. is registered with the Federal Communications Commission (“FCC”) and holds the 499 Filer ID number of 832166. The Company’s FRN/CORESID Number is 0018349092.

THE COMPANY PRIMARY PLACE OF BUSINESS

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STIRSHAKEN COMPLIANCE

Through its underling carriers the company is fully compliant as a switchless reseller. As a switchless reseller Vertical Communications does not own its own network or infrastructure of any kind and therefore has no access to any IP portion of any call, or a SIP header of any call.

ROBOCALL MITIGATION PLAN

This Robocall Mitigation Plan describes the specific measures that the Vertical Communications has implemented to detect and prevent illegal robocalls on its network as of June 30, 2023. Vertical Communications will periodically evaluate the risks it faces, the effectiveness of its policies and procedures, and its capabilities to support the measures described. Should Vertical Communications determine that changes are appropriate, its practices may differ from those described below.

Risk Assessment. Vertical Communications is a switchless reseller that offers calling products by use of an undelying platform provider who owns the infrastructure to support VoIP calling. The Company resells these services to business customers. The Company's customers generally do not originate high volume short duration ("HVSD") calls and Vertical Communications has not received information suggesting that robocalls are originated by any of its customers. Therefore, Vertical Communications leadership does not consider the Company at high risk of originating illegal robocalls.

KNOW YOUR CUSTOMER

Vertical Communications has a rigorous KYC policy for the in order to support the Business Customers that it resells services to. Vertical Communications has an in-depth presales process where representatives of v work with the prospect or customer to understand all the unique factors of the Customer's business. Thie objective of this is twofold: a. to get to know the customer; and b. to provide the best possible service to the customer by fully understanding all facets of their business.

Vertical Communications performs a thorough reputation check on each of its customers and verifies the following information: legal business name, legal form of business, federal tax ID, nature of the business, primary contact person, and service address.

Not only does Vertical Communications have a rigorous intake and Onboarding process where it secures extensive information for Customers but all relationships between Vertical Communications and customers are governed by an MSA.

The Company performs a thorough credit check on each of its customers and verifies the following information: legal business name, legal form of business, federal tax ID, nature of the business, primary contact person, and service address.

Vertical Communications conducts due diligence on new and renewing customers, confirming the customer's identity and, if it is a business, is incorporation documents. Vertical Communications confirms the customer's service address for all customers.

- Vertical Communications verifies customer's business reputation prior to providing service.
- Vertical Communications verifies customer information when contracts are renewed or services are added.
- Vertical Communications verifies the customer's identity and their right to use the telephone number presented on calls.

- Vertical Communications has the policies that define the circumstances by which it will deny, suspend or terminate service to a customer.

When the Company commences operations with a customer, the Company verifies all new customers with a combination of electronic and manual verification systems, credit reviews, references from trusted industry members, and previous experiences with customer executives and employees. The Company severely limits the capabilities of new accounts until these appropriate processes are complete.

Additionally, all customers are required to agree to, and; are contractually bound by Vertical Communications strict policies, contractual terms and conditions and a Company Acceptable Use Policy (“AUP”) prohibiting the act of fraudulent voice activity as a condition of doing business with Vertical Communications.

If any customer is found to be in proposed or actual violation of any Company policy as it relates to suspicious traffic and/or possible fraud, the Company has the right to immediately halt, cease and/or suspend the customers account or associated telephone numbers.

Measures to Prevent or Avoid Illegal Robocalls

- Vertical Communications has in place an enforceable terms of use and/or an acceptable use policy. Vertical Communications also has in place policies designed to detect and prevent fraudulent traffic on its network.
- Vertical Communications uses analytics technologies and services provided by its upstream provider to monitor traffic on its network and identify potentially unlawful call origination activity. If Vertical Communications has a reasonable basis to believe that a customer is originating illegal robocalls, it will require the customer to remedy the problem and, if effective action is not taken, Vertical Communications can suspend and/or terminate service to the customer by the use of the underlying platform which is provided by the underlying carrier.
- Vertical Communications can block various types of calls by default by using the tools provided to the Company by the underlying provider who supports the platform.

TRACEBACK

Vertical Communications is committed to cooperating with the Federal Communications Commission (FCC), law enforcement, and the industry traceback consortium in investigating

and stopping any illegal robo-callers that it learns are using our service to originate calls or transit calls into the United States and territories.

The Company commits to fully responding within 24 hours to all traceback requests from the ITG, the TPTG, the FCC, and law enforcement. The Company shall cooperate with these groups to investigate and stop any illegal robo-callers from using the Company's service to carry or process illegal calls.

When notified by the FCC's Enforcement Bureau, Company shall block and report identified illegal traffic, and any substantially similar traffic, on an ongoing basis (unless Company's investigation determines that the traffic is not illegal) when Company receives actual written notice of such traffic from the Enforcement Bureau. If Company determines that the identified traffic is not illegal, Company shall provide the Enforcement Bureau with an explanation as to why Company reasonably concluded that the identified traffic is not illegal, and what steps it took to reach that conclusion.

The Company utilizes a combination of tools provided by its underlying carriers and platform providers along with third-party solutions to check for Do Not Originate (DNO) numbers. In addition, the Company utilizes a combination of internal tools and third-party solutions to detect invalid phone number formats, area codes and unassigned number blocks. The Company also utilizes data analytics to detect and investigate irregular and unexpected calling patterns, originating number use against customer profiles.

UPSTREAM PROVIDERS

As a switchless reseller, Vertical Communications uses the services and provisioned platforms from a number of upstream providers. The two key primary upstream providers listed below provide the platform to Vertical Communications. As a switchless reseller, does not own its own infrastructure. And the Company is reliant upon its upstream provider for switching customer calls that originate on the Company's underlying Carrier's platform(s). Further the Company does not have access to the SIP header of any VoIP call.

1. Mometum Telecom
29363 Network Place
Chicago, IL 60673-1293
859-721-4248
Stephanie.anderson@gomomentum.com

2. Ring Central, Inc
20 Davis Dr
Belmont, CA
94002
888-898-4591
Marc.lening@ringcentral.com

As stated the Company (as a switchless reseller) by leveraging its underlying platform provider. The company has the ability through this platform and with the interaction of the upstream provider, to reserve the right to refuse traffic from any party at any time where robocalling or use of originating numbers that are not valid.

The Company (as a switchless reseller) by its underlying platform provider is able to block the originating number(s), terminating numbers(s), trunk(s) or customer, including termination of customer relationship to prevent robocalling, invalid originating number or spoofed origination number transiting the Company's networks.

ONGOING ROBOCALL MITIGATION

Vertical Communications monitors and examines call detail records (CDRs) on a repeating basis to detect suspicious call activity and/or calling patterns. When Vertical Communications, or its underlying provider detects network usage patterns consistent with illegal robocalls or suspects illegal robocalling is taking place, Vertical Communications will immediately seek to identify the party that is originating, terminating, or routing these calls and take appropriate action.

The actions taken may include, but are not limited to, initiating a traceback investigation; verifying that the originating customer owns or is authorized to use the Caller ID number; determining

whether the Caller ID name sent to a receiving party matches the customer's corporate and/or d/b/a name; blocking the party's ability to originate, terminate, or route calls on the network; and/or providing notice to law enforcement authorities.

As part of Vertical Communications's Plan to mitigate and prevent any originating robocalls, Vertical Communications is committed to early identification and investigation of possible robocalling conditions. Among other things, with the tools and resources provided to the Company by its underlying carrier, Vertical Communications watches for higher-than-normal subscriber traffic volume, including large bursts of traffic in small timeframes or spikes in usage. With the tools provided to the Company by its underlying provider, Vertical Communications also monitors for originating calls classified as high volume short duration ("HVSD"), tracks for low call completion percentages, and/or originating calls with sequential called-to-number dialing patterns.

COMPANY DECLARATION

The Company certifies that it has never been under investigation or committed any violations within the last two years with any local, state, or Federal agency or equivalent related to telemarketing or robocalling. Additionally, the Company is not currently subject to a formal action or investigation due to suspected unlawful robocalling or spoofing.

If when and as the Company business may change designated Company representatives only will update this RMP as appropriate.