

## **REZONATE INDUSTRIES INC.**

### **ROBOCALL MITIGATION PLAN**

Rezonate Industries, Inc. (“Rezonate”) is a service provider that offers interconnected VoIP services to residential and business subscribers on a resold basis. Rezonate’s wholesale VoIP provider is Momentum Telecom, Inc. (“Momentum”).

While Rezonate necessarily relies on the robocall mitigation policies, procedures, and safeguards instituted by Momentum, Rezonate has also adopted this robocall mitigation plan to take its own measures to limit the potential for the origination of unlawful robocalls by its customers that would be carried and processed by Momentum and other downstream providers.

#### **Know-Your-Customer Policies**

***Subscriber Vetting:*** Rezonate vets the identity of its customers when approving an application and entering into an agreement to provide telephone service. As part of this vetting process, Rezonate visits each location where service will be provided and collects the customer’s name, address, telephone number, and email address. For residential customers, Rezonate also collects the social security number or driver’s license number. For business customers, Rezonate verifies the business’s registration with the Florida Department of State Division of Corporations. Rezonate’s services are provided to fixed locations and services are installed on location by its personnel, so Rezonate knows the actual location of its customers. This information enables Rezonate to validate the identity of potential customers prior to provisioning of service. Service will not be provided if a new customer’s identification cannot be verified.

***Contractual Terms:*** Rezonate’s terms of service prohibit the use of its telephone service for fraudulent or unlawful acts or purposes and prohibits customers from falsifying calling party identification information. Rezonate may terminate a customer’s service for violations of its terms.

#### **Use of Call Analytics to Identify and Block Unlawful Traffic**

Rezonate relies on Momentum’s use of call analytics systems to identify and block unlawful robocall traffic as set forth in Momentum’s robocall mitigation plan on file with the FCC.

Momentum reports that its call analytics can detect call patterns that indicate robocall activity, including, but not necessarily limited to, an unusual large number of calls from the same number, an excessive number of short duration calls, and calls that stop attempting to connect after a single ring, and calling numbers that are invalid, unallocated, or on the Industry Traceback Group’s Do Not Originate (“DNO”) list.

If Rezonate receives a report or alert from Momentum of suspected unlawful robocall traffic originated by a Rezonate end user customer, Rezonate will conduct an investigation. To the extent a customer is found to have violated terms, Rezonate will take action commensurate with the severity of the customer’s offense, including, but not limited to, providing the customer with a warning or terminating the customer’s service without notice.

### **Knowledge of Upstream Providers**

Rezonate's upstream provider Momentum is a well-known, reputable wholesale service provider that is registered in the FCC's Robocall Mitigation Database. Rezonate does not itself have knowledge or insight into the upstream providers from which Momentum receives traffic, but understands from its mitigation plan that its direct upstream connections are with service providers that similarly have represented to the FCC that they have policies and procedures to identify and block unlawful robocall traffic.

### **Cooperation with the Traceback Group, Law Enforcement and Government Agencies**

Rezonate is committed to responding fully and within 24 hours to all traceback requests made by the Industry Traceback Group ("ITG"), law enforcement authorities, and government agencies to investigate and address suspected unlawful robocalls originated by Rezonate customers.

Rezonate is also committed to cooperating with Momentum on traceback requests and to complying with the Commission's robocall blocking requirements. Rezonate understands that its wholesale provider will block all calls and provider traffic that: (1) are identified in any public notice or order released by the FCC; (2) are substantially similar to the types of traffic identified in any public notice or order released by the Commission; or (3) include a caller ID number or name that is on DNO list issued by ITG.