



**Network Data Solutions, Inc.
Robocall Mitigation Program**

Network Data Solutions, Inc. is a non-facilities-based reseller of Voice over Internet Protocol (VoIP) service. Our wholesale network provider is CoreDial, LLC. This Robocall Mitigation Plan describes the specific reasonable steps that Network Data Solutions has taken to avoid the origination, carrying, or processing of illegal robocall traffic on our wholesale provider's network.

Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Robocalls

Network Data Solutions has a "know-your-customer" policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. Network Data Solutions vets the identity of all of all new and renewing end-user customers which are primarily small and mid-sized businesses. In particular, we collect information such as their physical business location, contact person(s), state or country of incorporation, federal tax ID, and the general nature of their business. Network Data Solutions has never received a request for high-volume origination services, but were we to receive such a request, we would exercise caution and extensively investigate the requesting entity prior to providing service.

Network Data Solutions has enforceable terms and conditions for the use of its services that define the circumstances by which we will deny, suspend, or terminate service to a customer. Likewise, our contracts with business customers contain provisions that allow termination in the instance that services are being abused. Network Data Services would not hesitate to suspend or terminate service to a customer that we discovered was using, or attempting to use, our services to originate illegal calls.

In addition, the Terms of Service agreement between Network Data Solutions and our wholesale network provider, CoreDial, contains acceptable use and traffic integrity terms that prohibit the use of CoreDial's services for illegal robocalling. Consequently, were CoreDial to find that an end-user customer of Network Data Solutions was originating illegal calls, CoreDial could require the suspension or termination of the customer's service.

"Know-Your-Upstream Provider" Procedures

Network Data Solutions relies upon the "Know-Your-Upstream Provider" procedures of its wholesale provider, CoreDial. Network Data Solutions is confident that CoreDial exercises due diligence prior to accepting traffic from an upstream provider.



Use of Call Analytics Systems

Network Data Solutions' wholesale network provider, CoreDial, utilizes internal data analytics to monitor its network for irregular and unexpected traffic patterns that appear abusive. If CoreDial identified a suspicious traffic pattern originating from a Network Data Solutions end-user customer, CoreDial would contact us, and together we would determine a course of action to promptly investigate the matter and address any illegal calling that was occurring. Also, CoreDial has the ability to limit any end-user customer's calling capacity via call-per-second and/or concurrent session limits.

In addition, CoreDial uses proprietary call analytics systems and processes to identify and block illegal robocall traffic bound for Network Data Solutions' end-user customers. By default, CoreDial blocks calls purporting to originate from numbers on a reasonable do-not-originate (DNO) list.

Commitment to Respond to Traceback Requests

Network Data Solutions commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping illegal robocallers that use its services to originate, carry, or process illegal robocalls.