

Equinox Technology Robocall Mitigation Program

1. Robocall Mitigation Program Description

Equinox Technology ("ET") is a voice service provider offering UCaaS solutions exclusively to business customers. All calls originated by ET's customers are routed through our underlying carrier partner, SkySwitch/NetSapiens, which has fully implemented the STIR/SHAKEN authentication framework across its network. Accordingly, all calls originated by ET are subject to STIR/SHAKEN and compliant with 47 CFR § 64.6301.

As part of our robocall mitigation program, ET has implemented the following measures:

- **Customer Vetting:** ET provides service only to verified business entities. Each new customer is required to provide valid business identification, including an Employer Identification Number (EIN) or other tax ID, prior to activation. Customers must also execute service agreements that expressly prohibit the origination of unlawful robocalls.
- **Traffic Monitoring:** ET relies on SkySwitch's network-level monitoring and analytics to detect abnormal or high-risk traffic patterns. Any suspicious activity is promptly reviewed, and accounts are subject to immediate investigation and suspension if found to be originating unlawful traffic.
- **Traceback Cooperation:** ET fully cooperates with the Industry Traceback Group, the FCC, and law enforcement. We respond to traceback requests within 24 hours and work closely with our carrier partner to ensure rapid mitigation of any identified illegal robocall activity.

2. Equinox Technology Fair Use Policy

Equinox Technology provides voice, messaging, and fax services exclusively to business customers. To maintain service quality, regulatory compliance, and protection against fraud, ET enforces the following usage thresholds:

- **Voice Services:** Local and long-distance calls are subject to a fair use cap of 3,000 minutes per seat per month. Usage above this threshold may be reviewed and subject to overage charges or account suspension if determined to be inconsistent with normal business use.
- **Toll-Free Services:** Toll-free calling includes an allowance of 500 minutes per account per month. Additional minutes are billed at published rates.
- **SMS Messaging:** SMS usage is capped at 3,000 messages per seat per month. Messages must comply with 10DLC registration and carrier spam prevention requirements.
- **MMS Messaging:** MMS usage is capped at 500 messages per seat per month. Multimedia content must comply with FCC and carrier guidelines.
- **Fax Services:** Electronic fax includes up to 300 pages per account per month. Additional pages are billed at published rates.
- **Exclusions:** International calls, directory assistance (411), and premium numbers (e.g., 900) are excluded from bundled services and billed at published rates.

ET reserves the right to suspend, terminate, or reprice service in cases of excessive usage, fraud, or violation of this policy.

3. Customer Terms – Robocalling Prohibition

As part of our Service Agreement, all customers agree to the following:

Prohibited Conduct: Customers may not use Equinox Technology's services to originate unlawful robocalls, unsolicited bulk calling, or any other activity in violation of federal or state laws, including the Telephone Consumer Protection Act (TCPA) and FCC regulations.

Equinox Technology provides service only to verified businesses with valid tax identification. By activating service, customers agree that all usage must be consistent with normal business communications. ET may suspend or terminate accounts engaged in prohibited calling activity, and will fully cooperate with traceback requests from the Industry Traceback Group, the FCC, or law enforcement.