

NETELLIGENT CORPORATION

ROBOCALL MITIGATION PLAN

Pursuant to 47 C.F.R. § 64.6305, Netelligent Corporation with designated other trade name of InterVision (“Netelligent”) 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 status of its implementation of STIR/SHAKEN and the practices and procedures Netelligent has in place to mitigate illegal robocalls. Netelligent 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.

Netelligent 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.

Netelligent is a Managed Service Provider based in Missouri focused on supporting businesses. As a Managed Service Provider, the Company provides multiple products and services to its customers along with telecommunications products and services and serves in the role of a reseller of UCaaS services to business customers.

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 reseller of these third-party services.

Netelligent, Inc. is registered with the Federal Communications Commission (“FCC”) and holds the 499 Filer ID number of 827485. The Company’s FRN/CORESID Number is 0018122846.

THE COMPANY PRIMARY PLACE OF BUSINESS

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LEADERS OF THE COMPANY ARE:

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CTO

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DESIGNATED RMD CONTACT

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STIR/SHAKEN IMPLEMENTATION

Netelligent will comply fully with all conditions set forth in the FCC'S 2020 Report and Order mandating the implementation of the STIR/SHAKEN framework, as well as with the Commission's rules and policies more generally.

Netelligent is implementing STIR/SHAKEN through use of the Company's underlying providers. This is a managed end-to-end call authentication solution that fully satisfies the FCC's STIR/SHAKEN requirements. Through its upstream providers the Company provides a standardized approach to call authentication and verification.

Netelligent has implemented this solution in the IP portions of its network by June 30, 2023, and the Company's traffic is fully attested by its underlying providers/upstream carriers.

The Company is reliant upon the services of upstream providers, to assign and attest to the validity of calls. The Company uses no more than two upstream providers as its primary vendors for all services and therefore these providers assign and attest to the numbers, they provide to Netelligent.

The attestation and assignment of calls as level A is designated by these upstream providers. If and when in benign cases these providers may provide a level B attestation. However, Netelligent does not normally, or in most; if not all cases have any other numbers supported outside of the Company's designated upstream providers.

ROBOCALL MITIGATION PLAN

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

Risk Assessment. Netelligent is a reselling voice service provider offering a variety of voice calling services through its underlying providers/upstream carriers. Its customers generally do not originate high volume calls and Netelligent has not received information suggesting that robocalls have ever existed. Therefore, Netelligent does not consider its network at high risk of originating illegal robocalls.

KNOW YOUR CUSTOMER

Netelligent has a rigorous KYC policy for the in order to support the Business Customers that it resells services to. Netelligent has an in-depth presales process where representatives of the company work with the prospect or customer to understand all the unique factors of the Customer's business. The 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.

Netelligent 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 Netelligent have a rigorous intake and Onboarding process where it secures extensive information for Customers but all relationships between Netelligent and customers are governed by an MSA which specifically states the business Customer is not able to resell any services which the Netelligent resells and the services which are sold to the Customer are strictly for the Customers own internal use.

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.

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

- Netelligent verifies customer's business reputation prior to providing service.

- Netelligent verifies customer information when contracts are renewed, or services are added.
- Netelligent verifies the customer's identity and their right to use the telephone number presented on calls.
- Netelligent 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 Netelligent 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 Netelligent.

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 customer's account or associated telephone numbers. The Company also has measures in place to prevent and avoid illegal robocalls via the use of tools provided to it by the Company's upstream providers as well as third party applications which they have deployed. Those measurements are:

- Having an established enforceable term of use and/or an acceptable use policy. Netelligent also has in place policies designed to detect and prevent fraudulent traffic on its network.
- Using analytics technologies and services provided by its upstream provider to monitor traffic on its network and identify potentially unlawful call origination activity. If Netelligent 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, Netelligent can suspend and/or terminate service to the customer by the use of the underlying platform which is provided by the underlying carrier.
- Call blocking various types of calls by default by using the tools provided to the Company by the underlying provider who supports the platform.

TRACEBACK

Netelligent 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 reseller, Netelligent uses the services and provisioned platforms from a number of upstream providers. The two key primary upstream providers listed below provide the platform and provide level A attestation levels to Netelligent calls.

1. Lumen
1025 Eldorado Blvd
Broomfield, CO 80021
Phone: 1-877-453-5353
Email: billing@lumen.com

2. Twilio
101 Spear Street, Fifth Floor
San Francisco, CA 94105
Phone: 415-390-2337
Email: invoicing@twilio.com

As stated, the Company (as a reseller) by leveraging its underlying platform provider. The company has the ability thought 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 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

Netelligent monitors and examines call detail records (CDRs) on a repeating basis to detect suspicious call activity and/or calling patterns. When Netelligent, or its underlying provider detects network usage patterns consistent with illegal robocalls or suspects illegal robocalling is taking place, Netelligent 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 the Company plan to mitigate and prevent any originating robocalls, Netelligent 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, Netelligent 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, Netelligent 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 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.