

AltiCom CTI, INC. Robocall Mitigation Plan

October 9, 2025

Business Information

AltiCom CTI's business name and primary address are as follows:

AltiCom CTI, Inc.

400 S 4th St., Suite 401-429

Minneapolis, MN 55415

Contact Information

Kevin Fjelsted

Chief Operating Officer

Phone: (612)424-7332

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Know Your Customer ("KYC")

The accurate identification of a subscriber in the STIR/SHAKEN ecosystem is tied to a telephone number-based caller identity associated with that subscriber. A subscriber is an entity that has a business relationship with AltiCom CTI in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

AltiCom CTI's KYC program obtaining specific information before allowing a potential subscriber to use our services. This process includes collecting business and contact details (company name, address, tax ID, authorized representative info), and requiring proof of identity and/or incorporation documents.

Moreover, AltiCom CTI accept payments only through approved billing methods (e.g., credit card, ACH, wire transfer). AltiCom CTI periodically reviews and updates customer records.

Know Your Upstream Providers

In accordance with the Commission’s directive in Advanced Methods to Target and Eliminate Unlawful Robocalls Call Authentication Trust Anchor, Seventh Report and Order In CG Docket 17-59 and WC Docket 17-97, Eighth Further Notice of Proposed Rulemaking In CG Docket 17-59, and Third Notice of Inquiry in CG Docket 17-59 (Rel. May 19, 2023) ¶¶ 49-51, AltiCom CTI provides the following information concerning its upstream voice service carriers:

Sangoma Wholesale Carrier Services

Tom Cavey

Technical Account Manager

Phone: +1 412 775 0026

Email: tcavey@sangoma.com

Web Site: <https://carrierservices.sangoma.com/>

AltiCom CTI has received assurances from its upstream providers that they will continue to sign calls transmitted to AltiCom CTI and will abide by the Commission’s STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to AltiCom CTI. AltiCom CTI and its upstream providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Telephone Number Analytics

A Telephone Number (“TN”)-based caller identity is the originating phone number included in call signaling used to identify the caller for screening purposes that is uniquely associated with the subscriber. A subscriber is permitted to use a TN as a caller identity if a TN is directly managed by AltiCom CTI and/or obtained by AltiCom CTI from AltiCom CTI’s underlying carriers for use by the subscriber. In most cases, AltiCom CTI directly manages the TNs used by its subscribers. AltiCom CTI tracks these numbers in its inventory system and monitors the assignment of these numbers. In these cases, TN validation is the inherent result of AltiCom CTI’s assignment of the TN to its subscriber.

Analytics for Monitoring Traffic

AltiCom CTI works with its upstream carriers to analyze high-volume voice traffic in order to identify and monitor patterns consistent with robocalls. If AltiCom CTI detects a calling pattern

consistent with illegal robocalls, we will identify the party and will take appropriate action. Taking appropriate action may include, but is not limited to, initiating a traceback investigation, verifying that the originating subscriber owns or is authorized to use the Caller ID number, and suspending or terminating the party's ability to originate calls on our system.

Examples of calling patterns monitored:

- Anomalies in cost generated by calls from a single customer;
- multiple overlapping calls on the same account is a risk of not having a single subscriber using the service;
- velocity on initiate calls (synchron intervals, quick dialing back-to-back calls);
- recent volumes (last 60 min) vs weekly trends;
- number of unique destination numbers in a time frame (total account level);
- number of unique source numbers in a time frame (total and account level); and anomalies in call duration distribution (most calls having similar duration is not representative for residential service usage).

No third party vendors are involved in deploying AltiCom CTI's analytics.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, AltiCom CTI works with its upstream providers to follow defined procedures on investigating such subscribers. These procedures include:

- checking recent and past call detail records and benchmark against expected trends;
- checking recent and past account activity and purchases;
- investigating if any system issue generates the strange behavior;
- verifying that the call originating path is valid; and contacting the subscriber to understand his particular use case and validate that the activity belongs to that subscriber.

AltiCom CTI follows Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback investigations. To allow for timely and comprehensive responses, AltiCom CTI devotes sufficient resources to provide prompt and complete resources to traceback requests.

AltiCom CTI works with its upstream providers to investigate suspicious activity found by the carriers' monitoring systems or reported to AltiCom CTI by subscribers or third parties. An

investigation could potentially result in opening a traceback request or with AltiCom CTI contacting a subscriber to correct improper use of the applicable platform, or, if the subscriber does not respond or comply, to notify its upstream provider(s) to block their use of the platform. AltiCom CTI certifies that it will respond to all traceback requests within 24 hours of receiving same.

Blocking

AltiCom CTI will implement Do Not Originate requests it receives from the ITG. AltiCom CTI works with its upstream providers to automatically block suspicious calls using analytics. If those analytics reveal suspected robocalling patterns that are confirmed with further investigation, AltiCom CTI will take appropriate action which may include suspending or terminating the subscriber's use of AltiCom CTI's network and utilizing service restriction blocks. AltiCom CTI will cooperate with Investigative Bodies to address traceback requests from law enforcement (including the state attorney general's office), as well as the FCC, and/or the ITG; as well as documenting requests & actions taken in response thereto.

Plan Updates

This plan and industry best practices must evolve to response to the dynamic nature of mitigating illegal robocalling. AltiCom CTI will monitor industry best practices and continuously improve our internal processes to ensure this plan, and our system adapt to this ever-changing issue.

In the event of any material change to this plan, AltiCom CTI will republish it to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.

Certification of Kevin Fjelsted

I, Kevin Fjelsted, Chief Operating Officer of AltiCom CTI, INC., Inc. ("AltiCom CTI"), do hereby certify, under penalty of perjury, the following:

Neither AltiCom CTI nor any of the persons listed herein have been subject to an FCC enforcement proceeding or have been forbidden to file in the Robocall Mitigation Database.

The name, title, department, business address, telephone number, and email address of the individual responsible for addressing robocall-related issues are listed in the above robocall mitigation plan.

Kevin Fjelsted Signature

A handwritten signature in black ink, appearing to read "Kevin Fjelsted", written in a cursive style.