



Collins Communications, Inc. - Robocall Mitigation Plan

Collins Communications, Inc. is fully committed to combating illegal robocalling. We pledge comprehensive cooperation with the Federal Communications Commission (FCC), law enforcement agencies, and the industry traceback consortium (ITG/TPTG) in investigating and proactively stopping any illegal robocallers utilizing our service for originating or transiting calls into the United States and its territories.

STIR/SHAKEN and Reseller Status

- **Reseller Information:** Collins Communications, Inc. is a reseller of **SkySwitch (RMD0002940)** (referred to herein as "the Company").
- **STIR/SHAKEN Implementation:** As a reseller, we do not possess the capability to implement STIR/SHAKEN protocols directly. However, our upstream provider, SkySwitch, has implemented STIR/SHAKEN protocols within their IP Voice network.
- **Database Compliance:** Collins Communications, Inc. has not been prohibited from filing a certification in the Robocall Mitigation Database.

Traceback and Enforcement Cooperation

- **Responsiveness:** Collins Communications, Inc. and the Company commit to fully responding within **24 hours** to all traceback requests received from the ITG, the TPTG, the FCC, and law enforcement.
- **Illegal Traffic Blocking:** Upon receiving actual written notice from the FCC's Enforcement Bureau regarding identified illegal traffic, the Company shall immediately block and report the identified traffic, as well as any substantially similar traffic, on an ongoing basis.
 - *Exception:* If the Company's internal investigation determines the identified traffic is *not* illegal, the Company shall provide the Enforcement Bureau with a detailed explanation outlining the reasonable conclusion and the steps taken to reach that determination.

Compliance History

- **Clean Record:** Collins Communications, Inc., including all its executives and principals, has no history of enforcement actions related to illegal robocalls, violations of the Telephone Consumer Protection Act (TCPA), Telemarketing Sales Rule (TSR), or related state laws.

Robocall Mitigation Techniques

The Company employs a robust, multi-layered approach combining internal tools and third-party solutions for traffic analysis and mitigation:

- **Number Validation:** Utilization of internal and third-party solutions to check for Do Not Originate (DNO) numbers, and detect invalid phone number formats, area codes, and unassigned number blocks.
- **Traffic Monitoring:** Use of data analytics to detect and investigate irregular and unexpected calling patterns and flag originating number use inconsistent with customer profiles.
- **Caller Vetting:** Adherence to the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group.
- **Network Protection:** Measures include network monitoring for suspicious traffic, limiting customer capacity via calls per second (CPS) and/or concurrent session limits, and regularly checking call patterns for potential abusive traffic.

Customer Vetting Policy

All new customers undergo a rigorous verification process before gaining full service access. This process involves a combination of electronic and manual verification systems, credit reviews, reference checks from trusted industry members, and evaluation of previous experiences with customer executives and employees. Collins Communications, Inc. severely limits the capabilities of new accounts until these comprehensive vetting processes are successfully completed.

Hosted VoIP Platform

Collins Communications, Inc. utilizes the following hosted VoIP platform:

- **Platform Provider:** PayG LLC dba SkySwitch Arborcrest 1
- **Address:** 751 Arbor Way, Suite 150, Blue Bell, PA 19422
- **Contact:** Phone: 747.777.8100 | Email: support@skyswitch.com

Right to Refuse and Block Traffic

Collins Communications, Inc. reserves the right to immediately refuse traffic from any party where robocalling, the use of invalid originating numbers, or unauthorized number use has occurred or is suspected. The Company has the technical capability to block the originating number(s), terminating number(s), trunk(s), or the entire customer account, including the termination of the customer relationship, to prevent illegal robocalling, invalid originating numbers, or spoofed origination numbers from transiting its networks.

Call Abuse Policy (TRACED Act Compliance)

In compliance with the TRACED Act, we have implemented a formal Call Abuse Policy, published on our website and terms of use, and communicated to our customers.

Policy Excerpt: "Any call originated on the Collins Communications, Inc. network is subject to inspection and investigation if the call is suspected of being fraudulent, abusive, or illegal. Calls meeting any of these criteria will be blocked. Repeated or excessive instances of these conditions may result in the subscriber's disconnection from the Collins Communications, Inc. network, further investigation by the FCC for enforcement of the TRACED Act, and potential fines and penalties imposed by the FCC or the jurisdictional court."