

AZKA COMMUNICATION (SMC-PRIVATE) LIMITED ROBOCALL MITIGATION PLAN

Overview:

Azka Communication (SMC-Private) Limited is a Voice over Internet Protocol (VoIP) provider that offers interconnected VoIP services to its subscribers. Azka Communication (SMC-Private) Limited utilizes “Tier-1” VoIP providers that are well-known, reputable service providers registered in the FCC’s Robocall Mitigation Database.

While Azka Communication (SMC-Private) Limited relies on the robocall mitigation policies, procedures, and safeguards implemented by its upstream providers, it has also adopted this robocall mitigation plan to take its own measures to limit the potential for the origination of unlawful robocalls by its customers. These measures are intended to prevent the transmission of such traffic across upstream and downstream networks.

Use of Call Analytics to Identify and Block Unlawful Traffic:

Azka Communication (SMC-Private) Limited relies on its upstream providers’ use of call analytics systems to identify and block unlawful robocall traffic, as described in their robocall mitigation plans on file with the FCC. These analytics systems are designed to detect call patterns indicative of potential robocall activity, including, but not limited to, unusually high call volumes from a single source, excessive short-duration calls, calls that terminate after a single ring, and calls originating from invalid, unallocated, or Industry Traceback Group (“ITG”) Do Not Originate (“DNO”) listed numbers.

If Azka Communication (SMC-Private) Limited receives a report or alert of suspected unlawful robocall traffic originating from one of its end-user customers, it will promptly conduct an investigation. If a customer is found to have violated “Service Agreement”, appropriate action will be taken based on the severity of the violation, including, but not limited to, issuing a warning or terminating the customer’s service.

Knowledge of Upstream Providers:

Azka Communication (SMC-Private) Limited utilizes upstream wholesale service providers that are registered in the FCC’s Robocall Mitigation Database and are recognized as reputable carriers. While Azka Communication (SMC-Private) Limited does not have direct visibility into all upstream providers from which traffic is received, it relies on its direct upstream providers’ representations that they maintain compliant robocall mitigation programs. These providers have certified to the FCC that they implement policies and procedures to identify and block unlawful robocall traffic within their networks.

Know-Your-Customer Policies:

Azka Communication (SMC-Private) Limited knows its customers and their policies by

- **Subscriber Vetting:** Azka Communication (SMC-Private) Limited vets the identity of its customers when approving applications for telephone service. As part of this process, Azka Communication (SMC-Private) Limited collects the customer’s legal name, address,

physical service location, and contact information. For commercial customers, additional information such as a federal tax identification number may be required. Azka Communication (SMC-Private) Limited may request further documentation as necessary to validate a customer's identity prior to provisioning service. Service will not be provided if a customer's identity cannot be verified.

- **Contractual Terms:** Certainly, Azka Communication (SMC-Private) Limited's Telecommunications Voice Service Agreement prohibits the use of its services for any illegal or fraudulent purpose, including the origination of unlawful robocalls. These agreements provide that Azka Communication (SMC-Private) Limited may suspend or terminate services if it determines that a customer's use of the services violates the applicable terms.

Cooperation with the Trace back Group, Law Enforcement and Government Agencies:

Azka Communication (SMC-Private) Limited is committed to responding fully and within 24 hours to all trace back requests made by the Industry Trace back Group ("ITG"), law enforcement authorities, and government agencies to investigate and address suspected unlawful robocalls originating from its customers.

Moreover, Azka Communication (SMC-Private) Limited is also committed to cooperating fully with its upstream providers in responding to trace back requests and to complying with all applicable FCC robocall mitigation and blocking requirements. Azka Communication (SMC-Private) Limited understands that its upstream providers implement call blocking measures consistent with FCC rules, including blocking calls or provider traffic that: (1) are identified in any public notice or order issued by the FCC; (2) are substantially similar to the types of traffic identified in such notices or orders; or (3) include caller ID numbers or names listed on the ITG Do Not Originate (DNO) list.

