

Gibson Teldata, Inc. – Robocall Mitigation Plan

BUSINESS INFORMATION:

Gibson Teldata Inc.
1472 Wabash Ave.
Terre Haute, IN 47807

Officers:

Brett Gibson, President

Gibson Teldata helps businesses and organizations nationwide leverage telecommunication technology to increase productivity, reduce operating costs, and protect their bottom line. As a reseller with no facilities or switch Gibson Teldata resells the products and services of others.

MEASURES TO PREVENT ORIENTATION OF ILLEGAL CALLS:

Gibson Teldata operates under a Know Your Customer, KYC, policy in order to support the Business Customers that it sells and resells services to. Gibson Teldata has an in-depth presale process where representatives of Gibson Teldata work with the prospect or customer to understand all the unique factors of the customer's business. This personal interaction that occurs between Gibson Teldata staff and the customer allows for Gibson Teldata to fully know who our customers are and allows for Gibson Teldata to provide the best possible solution based on our understanding of their business.

Gibson Teldata follows a thorough process with each new customer intended to verify the following information: legal business name (verified through the use of State Government sites), legal form of business, federal tax ID, nature of the business, primary contact person, and any service addresses. As part of the onboarding process, each new customer is required to complete an Account Information Form (AIF) for above verification purposes but also sign an appropriate level of service agreement.

STIR/SHAKEN:

As a reseller, Gibson Teldata has no switch and lacks control over the facilities and network of upstream service providers infrastructure necessary to implement STIR/SHAKEN. Therefore, Gibson Teldata itself is not able to implement STIR/SHAKEN in any manner and, alternatively, relies upon those services provided by upstream named carriers in this Robocall Mitigation Plan, which own and maintain the network infrastructure, to implement and utilize STIR/SHAKEN authentication and provide attestation to all calls and validate all numbers.

NETWORK MONITORING AND CALL BLOCKING:

Gibson Teldata is dependent upon the underlying carrier partners to provide notice of suspected robocalls are detected or reported on the underlying service provider's network. Upon notification, Gibson Teldata will work with its customers and the underlying service providers to verify the intent of the call traffic and block all calls originating from customers that is determined to be fraudulent or illegal activity.

TRACEBACK AND INQUIRY & RESPONSE:

Gibson Teldata commits to responding to all inquiries made by the FCC, law enforcement, the ITG and/or any other like or similar governing body within 24 hours of initial request. Gibson Teldata is fully committed to combating robocalling and other nefarious acts and violators of the TCPA. Gibson Teldata shall always fully cooperate with these groups to investigate and stop any illegal activity and people who try to commit such acts from using provided services to carry or process illegal calls. When notified by any agency, the ITG, any regulatory governing concern and/or the FCC's Enforcement Bureau, Gibson Teldata immediately direct its underlying provider to 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). If and when Gibson Teldata determines that the identified traffic is not illegal, Gibson Teldata shall provide the Enforcement Bureau with an explanation as to why Gibson Teldata reasonably concluded that the identified traffic is not illegal, and what steps it took to reach that conclusion.

UPSTREAM PROVIDERS:

Through its upstream provider, Gibson Teldata is a reseller of voice services and leverages the network of those upstream carriers.

Service Provider:

PayG, LLC dba SkySwitch

Contact Person: Jennifer Nading, SVP UCaaS Operations

Address: 751 Arbor Way, Suite 150, Blue Bell, PA 19422

Phone No.: 747-777-8100 x4619

Email address: regulatory@bcmone.com

OCN: 738j

COMPANY DECLARATION:

Gibson Teldata 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, Gibson Teldata is not currently subject to formal action or investigation due to suspected unlawful robocalling or spoofing.

PLAN UPDATES:

This plan and industry best practices must evolve to respond to the dynamic nature of mitigating illegal robocalling. Gibson Teldata 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, Gibson Teldata will republish to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.