



The following policies apply to all customers and/or prospective customers of MITCOMM and comprise our Robocall Mitigation Plan to avoid creating illegal robocall traffic from our network:

1. **CONTRACT REQUIREMENT:** Our agreements clearly prohibit passing illegal robocalls through any of our switches or networks and define precise requirements for ASR, LCD, and other traffic statistics. Customers who violate these rules are subject to immediate termination without notification. If MITCOMM believes illegal traffic has been passed through its network, the customer sending such traffic forfeits confidentiality, and all data will be shared with industry partners and law enforcement as required by regulatory bodies.
2. **CUSTOMER DISCLOSURES AND CONFIRMATION:** All customers are required to disclose certain information about their business, such as physical location, contact personnel, state/country of incorporation or business formation, federal tax I.D., or non-USA government I.D. They must also disclose the practices and nature of their business. We endeavor to know the precise type of traffic that originates from each customer's switch, including the type of customers they acquire and the exact type of services they provide. MITCOMM investigates each Customer's claims to verify accuracy before accepting them as a customer.
3. **MONITORING AND TRACEBACK:** MITCOMM monitors its system diligently and will investigate any suspicious traffic. We act promptly when we detect traffic that appears to be robocall activity to ensure it has been preauthorized as "legal" (i.e., authorized political, non-profit, reverse 911, or fully-opted-in traffic). In the event MITCOMM receives a Traceback request for an illegal robocall, we will act on it immediately, request a specific and detailed explanation from our customer(s), and insist on immediate corrective action. We will respond to all traceback requests from authorities in a timely manner. If corrective action is not provided in a timely manner by our customer, MITCOMM takes whatever action is necessary to prevent recurrence of the event(s).
5. **FOREIGN SOURCES OF TRAFFIC:** MITCOMM has non-USA customers that service their own customers and traffic that originates from both USA and Non-USA sources. We take extra precautions relative to Non-USA customers to ensure they meet all requirements of this Robocall Mitigation Plan. Prior to authorizing a foreign customer for calling privileges, we verify all information requested.
7. **CALL BLOCKING:** MITCOMM blocks all calls originating from numbers known to us that send illegal robocall traffic and/or calls destined to specific phone numbers as appropriate for robocall mitigation.
8. **LAW ENFORCEMENT COOPERATION:** MITCOMM cooperates fully with investigative authorities, industry traceback groups, the FCC, and the official consortium designated to lead private traceback efforts. We have a single contact individual designated to handle all traceback requests and coordinate with outside investigations.