

OWYLS INCORPORATED

Robocall Mitigation Program Details

This Robocall Mitigation Program ("Plan") is submitted by OWYLS INCORPORATED pursuant to the provisions of 47 C.F.R. § 64.6305, adopted by the Federal Communications Commission (FCC), which require all voice service providers to establish and maintain a robocall mitigation program.

This Plan sets forth OWYLS INCORPORATED's policies and procedures designed to reduce or eliminate outbound illegal robocalls originating on its network. OWYLS INCORPORATED considers these measures to constitute reasonable steps to avoid the origination of illegal robocalls and commits to responding fully and within twenty-four (24) hours to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG), and to cooperate with such entities in investigating and stopping any illegal robocallers that may use its service to originate calls.

I. STIR/SHAKEN IMPLEMENTATION STATUS

OWYLS INCORPORATED has fully implemented the STIR/SHAKEN authentication framework across its entire network and is fully compliant with all applicable requirements of 47 C.F.R. § 64.6301.

OWYLS INCORPORATED certifies that all calls it originates are subject to a robocall mitigation program consistent with 47 C.F.R. § 64.6305(a), which includes reasonable steps to avoid originating illegal robocall traffic and a commitment to respond fully and within twenty-four (24) hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium. OWYLS INCORPORATED further certifies that any prior certification has not been removed by Commission action and that it has not been prohibited from filing in the FCC Robocall Mitigation Database.

II. TRACEBACK REQUESTS

OWYLS INCORPORATED cooperates fully with the FCC, law enforcement agencies, and the Industry Traceback Group (ITG) on all traceback requests. OWYLS INCORPORATED dedicates sufficient resources to promptly and comprehensively respond to all traceback requests and commits to responding fully within twenty-four (24) hours of receipt. A single point of contact for traceback requests is identified in Appendix A.

OWYLS INCORPORATED includes traceback cooperation language in its carrier interconnection and service agreements, requiring counterparties to promptly identify upstream providers or originating customers associated with suspected illegal robocalls.

III. CUSTOMER VETTING PRACTICES

OWYLS INCORPORATED employs robust customer vetting practices to confirm the legitimacy of all voice service subscribers and to prevent the use of its network for illegal robocall activity.

As part of its vetting process, OWYLS INCORPORATED verifies publicly verifiable business information for business and commercial customers, including:

- Legal business name and any d/b/a registrations
- Valid physical office location
- Active business website and domain
- Federal Tax Identification Number (EIN)
- State or country of incorporation or registration
- Authorized contact persons and contact information
- Nature and purpose of the customer's business

OWYLS INCORPORATED may review additional public records, online presence, and third-party data sources. Higher-risk customers may be subject to enhanced due diligence. OWYLS INCORPORATED reserves the right to deny, suspend, or terminate service if customer information cannot be verified or if service usage is inconsistent with represented business purposes.

OWYLS INCORPORATED also monitors call activity and reviews call detail records (CDRs) to identify unusual or suspicious calling patterns. Customers are contacted within twenty-four (24) hours if activity indicative of illegal robocalls is detected.

IV. TELEPHONE NUMBER VALIDATION PRACTICES

OWYLS INCORPORATED maintains procedures to confirm a customer's right to use telephone numbers presented as Caller ID. Customers may only originate calls from numbers assigned by OWYLS INCORPORATED or obtained through approved partners. Screening controls ensure originating numbers match authorized assignments.

V. INTERNATIONAL CALL ORIGINATORS

OWYLS INCORPORATED is not currently an international voice services provider. If it begins providing service to international call originators using NANP resources, OWYLS INCORPORATED will implement enhanced vetting and validation practices consistent with FCC guidance.

VI. KNOW YOUR UPSTREAM PROVIDER PROCEDURES

OWYLS INCORPORATED maintains relationships with a limited number of upstream providers and exercises due diligence to ensure such providers are committed to preventing illegal robocall traffic. Robocall mitigation and traceback cooperation language is included in applicable agreements. Current upstream provider information is included in Appendix A.

VII. ONGOING ROBOCALL MITIGATION PRACTICES

OWYLS INCORPORATED monitors network usage and CDRs on a recurring basis to detect suspicious call activity, including traffic spikes, short-duration calls, sequential dialing patterns, calls to invalid or unassigned numbers, and calls to Do-Not-Call registries.

When suspicious activity is identified, OWYLS INCORPORATED may initiate traceback investigations, validate Caller ID authorization, suspend or terminate service, and notify law enforcement authorities.

VIII. THIRD-PARTY ANALYTICS

OWYLS INCORPORATED may use third-party call analytics platforms to assist in detecting and preventing illegal robocalls, including traffic analysis, reputation screening, and blocking of high-risk call patterns. Details of analytics vendors, if applicable, are included in Appendix A.

Appendix A

Traceback Request Single Point of Contact:

Name: John Reis

Title: Operations

Phone Number: 985 231 0857

Email Address: john@owyls.com

Upstream Provider Information:

Name of Upstream Provider: SKY SWITCH

Nature of Business: Hosted PBX, SBC, SIP Trunk Provider

Network Location: Arbor Crest I, 751 Arbor Way, Suite #150, Blue Bell, PA 19422

Contact Name / Title: Network Operations / Operations

Phone / Email: (747) 777-8100 / support@skyswitch.com