

PemTel

Robocall Mitigation Plan

PemTel is a reseller of SkySwitch services and is committed to full compliance with all applicable federal and state regulations governing voice services in all jurisdictions in which we operate. PemTel has implemented the following robocall mitigation practices to prevent the origination and transmission of illegal robocalls on its network.

1. Network Monitoring and Traffic Mitigation

As a reseller, PemTel relies on its underlying carrier, SkySwitch, for advanced technological mitigation measures. These measures include:

- Deployment of software that monitors outbound voice traffic in real time to detect and prevent the origination of illegal robocalls.
- Generation of detailed reporting identifying suspected illegal robocall activity.
- Automated alerts to SkySwitch when calls originate using calling numbers that are:
 - Invalid
 - Unallocated

SkySwitch promptly investigates any identified suspicious calls to determine whether the caller is attempting to originate unlawful robocalls. If unlawful activity is confirmed, the customer is either issued a warning or their service is suspended or terminated, as appropriate.

2. Invalid DID Controls

PemTel (via SkySwitch) currently monitors calls traversing its network for invalid Direct Inward Dialing (DID) numbers. Calls identified with invalid DIDs are not signed with a STIR/SHAKEN attestation.

PemTel (via SkySwitch) is implementing additional safeguards under which calls utilizing invalid DIDs will not be permitted to egress the network, with the exception of emergency (911) calls.

3. STIR/SHAKEN Attestation Practices

PemTel participates in the STIR/SHAKEN framework through its underlying carrier:

- Calls originating from numbers directly assigned to PemTel by SkySwitch are signed with full “A” attestation.

- Calls originating from numbers ported in from other service providers (e.g., Bell Canada) are signed with “B” attestation, reflecting appropriate verification of the customer and number usage rights.

4. Customer Vetting and Contractual Safeguards

PemTel employs a thorough customer vetting process prior to service activation. This includes:

- Verification that business customers are registered with the Canada Revenue Agency (CRA) and possess a valid tax number.
- Inclusion of a contractual addendum in all service agreements requiring customers to certify that they will not engage in illegal robocall activity.

Violation of this certification constitutes grounds for immediate suspension or termination of service.

5. Ongoing Compliance Commitment

PemTel remains committed to monitoring regulatory developments and enhancing its mitigation measures as required. The company will continue to cooperate with its underlying carrier and with regulatory authorities to prevent the origination and transmission of illegal robocalls.

PemTel certifies that the information contained in this Robocall Mitigation Plan is accurate to the best of its knowledge and reflects the mitigation practices currently in place.