

Trigent Technologies LLC Robocall Mitigation Program

Trigent Technologies LLC is a non-facilities-based reseller of voice over Internet Protocol (VoIP) service. Our wholesale network provider is CoreDial, LLC. This Robocall Mitigation Plan describes the specific reasonable steps that Trigent Technologies has taken to avoid the origination, carrying, or processing of illegal robocall traffic on our wholesale provider's network.

Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Robocalls

Trigent Technologies has a "know-your-customer" policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. Trigent Technologies vets the identity of all new and renewing end-user customers, which are all business customers. In particular, we collect information such as their physical business location, contact person(s), state or country of incorporation, and the general nature of their business. Trigent Technologies has never received a request for high-volume origination services, but were we to receive such a request, we would exercise caution and extensively investigate the requesting entity prior to providing service.

In addition, the Terms of Service agreement between CoreDial, LLC and Trigent Technologies contains acceptable use and traffic integrity terms that prohibit the use of CoreDial's services for illegal robocalling. Consequently, were CoreDial to find that an end-user customer of Trigent Technologies was originating illegal calls, CoreDial could require the suspension or termination of the customer's service.

"Know-Your-Upstream Provider" Procedures

Trigent Technologies relies upon the "Know-Your-Upstream Provider" procedures of its wholesale provider, CoreDial, LLC. Trigent Technologies is confident that CoreDial exercises due diligence prior to accepting traffic from an upstream provider.

Use of Call Analytics Systems

Trigent Technologies' wholesale network provider, CoreDial, LLC, utilizes internal data analytics to monitor its network for irregular and unexpected traffic patterns that appear abusive. If CoreDial identified a suspicious traffic pattern originating from a Trigent Technologies end-user customer, CoreDial would contact us, and together we would determine a course of action to promptly investigate the matter and address any illegal calling that was occurring. Also, CoreDial has the ability to limit any end-user customer's calling capacity via call per second and/or concurrent session limits.

In addition, CoreDial uses proprietary call analytics systems and processes to identify and block illegal robocall traffic bound for Trigent Technologies' end-user customers. By default, CoreDial blocks calls purporting to originate from numbers on a reasonable do-not-originate (DNO) list.

Commitment to Respond to Traceback Requests

Trigent Technologies commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping illegal robocallers that use its services to originate, carry, or process illegal robocalls.