



Robocall Mitigation Plan

We are a reseller of PayG LLC dba SkySwitch (RMD0002940) and are unable to implement STIR/SHAKEN due to a lack of control over the network infrastructure necessary to implement STIR/SHAKEN, pursuant to 47 CFR § 64.6305(d)(2)(i). PayG LLC dba SkySwitch Arbor Crest 1, 751 Arbor Way, Suite 150, Blue Bell, PA 19422, Phone 747-777-8100 Email: support@skyswitch.com has implemented STIR/SHAKEN protocols in their IP Voice networks. We have not been prohibited from filing a certification in the Robocall Mitigation Database.

Tera Communications, LLC, nor any of our executives or principals have a history of enforcement actions for illegal robocalls, TCPA or TSR violations or related state law violations. We use the affirmative and effective measures detailed below to prevent the origination or transit of illegal robocalls.

Know Your Customer

We follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group.

(<https://docs.fcc.gov/public/attachments/DOC367133A1.pdf>)

Traceback

We respond and cooperate with traceback request from the Commission, law enforcement, and registered traceback consortium in investigating and stopping any illegal robocallers that use our service to originate calls

STIR/SHAKEN Compliance

We are a reseller of voice services hosted on VoIP platforms by PayG LLC dba SkySwitch and are unable to implement STIR/SHAKEN due to a lack of control over the network infrastructure necessary to implement STIR/SHAKEN, pursuant to 47 CFR§ 64.6305(d)(2)(i). PayG LLC dba SkySwitch has fully implemented STIR/SHAKEN protocols in their IP Voice networks (RMD0002940).

Robocall Mitigation Program

We rely on software provided by PayG LLC dba SkySwitch to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls. Combining behavioral analytics, caller authentication and verification, our solution features:

- **Fraud Detection:** Detection of high-volume robocalling, spoofing and spam call activity.
- **Subscriber Notification:** Caller ID Name override to warn subscribers of suspicious calls.
- **Call Blocking Support:** Accurate identification enabling you to block fraudulent phone calls as per the TRACED Act (2019).
- **Business Number Verification:** Register legitimate business numbers to prevent unintentional call blocking.
- **Caller ID Name Service:** Easy integration of Caller ID name lookup service, including robocall mitigation with override to

include original caller ID even when call is determined fraudulent.

- **Do Not Call Registry:** We comply with the FTC's rules for the Do Not Call Registry.

In addition, we have implemented a Call Abuse Policy, as it pertains to the TRACED Act, and have published the following policy to our web site, terms of use, and have notified our customers of the policy as copied below:

“Any call originated using services provided by Tera Communications LLC, including services delivered through our upstream providers’ networks, is subject to monitoring, inspection, and investigation if reasonably suspected of being fraudulent, abusive, unlawful, or otherwise in violation of applicable federal or state law.

Calls determined to meet such criteria may be immediately blocked, suspended, or terminated without prior notice. Repeated, excessive, or egregious violations may result in suspension or permanent disconnection of the subscriber’s services.

Tera Communications LLC reserves the right to refer suspected unlawful activity to the Federal Communications Commission, law enforcement authorities, or other appropriate regulatory bodies for investigation and enforcement under the TRACED Act and other applicable laws. Subscribers may be subject to civil penalties, fines, or other legal remedies imposed by regulatory authorities or courts of competent jurisdiction.”