

Robocall Mitigation Plan

We are a reseller of a Hosted VoIP platform provided by RingLogix, LLC. (RMD0002349). They perform the role in the call chain of a voice service provider with a full STIR/SHAKEN implementation serving end-users.

We have not been prohibited from filing a certification in the Robocall Mitigation Database.

Netcom, Inc. 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 caller ID authentication best practices for vetting caller identity and operational legitimacy for new and existing customers as described by the NANC Call Authentication Trust Anchor Working Group.

The following information is collected from our customers during the standard onboarding process:

- o Name.
- o Federal Taxpayer ID.
- o Physical and mailing addresses.
- o Contact telephone numbers.
- o Email addresses of principals and controlling persons of the entity.
- o Any persons with a majority ownership interest in the customer.
- o Staff responsible for compliance with TCPA, TSR, and other such laws.

Our contractual provisions with customers prohibit them from initiating illegal robocalls. If we find a customer initiating suspicious robocalls, we warn them to stop. If such traffic continues, we then terminate their service.

- **Traceback**

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

- **Robocall Mitigation Program**

Call analytics software provided by our Hosted VoIP partner (RingLogix, LLC.) is used to monitor all outbound voice traffic in real-time to prevent the origination or transit of illegal robocalls. RingLogix, LLC. has implemented STIR/SHAKEN in their network.

This software provides detailed reporting to identify suspected illegal robocalls. The system blocks and alerts us if we process outbound calls whereby the calling number has a poor reputation or is invalid, unallocated, or on a Do Not Originate list. We immediately investigate any identified suspicious calls to determine if the caller was attempting to originate or transit unlawful robocalls. If we determine that the traffic was likely unlawful, we warn them to stop sending such traffic. If they continue to send traffic that appears to be unlawful, we terminate their service.

We are prepared to block calls or terminate service from any customer or source if asked to do so by the FCC.

- **STIR/SHAKEN**

As a reseller, we do not have the capability to implement STIR/SHAKEN. Our STIR/SHAKEN solution is supplied by RingLogix, LLC. They have fully implemented STIR/SHAKEN.