

Cobalt Ridge, LLC d/b/a Cobalt Technology

ROBOCALL MITIGATION PLAN

Cobalt Ridge, LLC d/b/a Cobalt Technology (“Cobalt Technology”) offers interconnected VoIP services to its subscribers on a resold basis. Cobalt Technology’s underlying voice service provider is PrimeVox Communications, LLC (“Primevox”), which is registered in the Robocall Mitigation Database and performs first-party STIR/SHAKEN authentication on calls originated by Cobalt Technology’s end-user customers.

While Cobalt Technology necessarily relies on Primevox’s robocall mitigation policies, procedures, and safeguards, Cobalt Technology has also adopted this robocall mitigation plan to take its own measures to limit the potential for the origination of unlawful robocalls by its customers that would be carried and processed by Primevox or other downstream providers.

Know-Your-Customer Policies

Subscriber Vetting: Cobalt Technology vets the identity of its customers when approving an application and entering into an agreement to provide telephone service. As part of this vetting process, new and renewing customers provide their name, business location, state of incorporation, federal tax ID, and other contact information. This information enables Cobalt Technology to validate the identity of potential customers prior to provisioning of service. Service will not be provided if a new customer’s identification cannot be verified.

Contractual Terms: Cobalt Technology’s terms of service prohibit the use of its voice service for fraudulent or unlawful acts or purposes, including, but not limited to, origination of unlawful robocalls on its network. To the extent a customer is found to have violated Cobalt Technology’s terms of service, Cobalt Technology will take action commensurate with the severity of the customer’s offense, including, but not limited to, warning, suspending, or terminating the customer’s service.

Use of Call Analytics to Identify and Block Unlawful Traffic

Cobalt Technology relies on Primevox’s use of call analytics systems to identify and block unlawful robocall traffic as set forth in its robocall mitigation plans on file with the FCC. Primevox reports that it uses several tools to combat illegal robocalls, including, but not limited to, monitoring traffic patterns including answer success rates and average call duration, Do Not Originate (DNO) list blocking, and payment method tracking to block customers with suspicious payment activities. Primevox also reports that it uses a third-party analytics provider, Nomorobo, to monitor traffic patterns through machine learning to alert its fraud team of suspicious activity or calling patterns.

If Cobalt Technology receives a report or alert from Primevox of suspected unlawful robocall traffic originated by an Cobalt Technology end user customer, Cobalt Technology will conduct an investigation and will work internally to identify the party that is potentially originating illegal robocalls. To the extent a customer is found to have violated terms, Cobalt Technology will take

action commensurate with the severity of the customer's offense, including, but not limited to, providing the customer with a warning or terminating the customer's service.

Knowledge of Upstream Provider

Cobalt Technology only receives upstream traffic from its wholesale provider, Primevox. Cobalt Technology has confirmed that Primevox is registered in the FCC's Robocall Mitigation Database.

Cooperation with the Traceback Group, Law Enforcement and Government Agencies

Cobalt Technology is committed to responding fully and within 24 hours to all traceback requests made by the Industry Traceback Group ("ITG"), law enforcement authorities, and government agencies to investigate and address suspected unlawful robocalls originated by Cobalt Technology customers.

Cobalt Technology is also committed to cooperating with its wholesale provider on traceback requests and to fully complying with the Commission's robocall blocking requirements. Cobalt Technology understands that Primevox will block calls and provider traffic that: (1) are identified in any public notice or order released by the FCC; (2) are substantially similar to the types of traffic identified in any public notice or order released by the Commissions; or (3) include a caller ID number or name that is on the DNO list issued by the ITG.