

Bay Business Edge Robocall Mitigation Compliance with TRACED Act

Bay Business Edge LLC (the "Company") is committed to cooperating with the Federal Communications Commission (FCC), law enforcement agencies, and the industry traceback consortium in their efforts to investigate and stop illegal robocallers. The Company actively cooperates with these entities whenever it becomes aware that its services are being used to originate or transit calls into the United States and its territories for unlawful purposes.

Implementation of STIR/SHAKEN

Bay Business Edge does not own the infrastructure, the Company has not implemented a STIR/SHAKEN call authentication framework and is not able to do so; as a Switchless Reseller of VoIP Services, the Company, lacks control over the facilities and network infrastructure necessary to implement STIR/SHAKEN and is therefore excluded from the FCC's implementation obligation in accordance with paragraph 40 of the FCC's Call Authentication Report and Orders. The Company is fully reliant upon its underlying carriers to maintain the network infrastructure for STIR/SHAKEN authentication.

Traceback Request Response Policy

The Company commits to responding to all traceback requests from the Industry Traceback Group (ITG), the Telephone Provider Traceback Group (TPTG), the FCC, and law enforcement within 24 hours. Cooperation is provided to these groups to investigate and eliminate illegal robocall activity from the Company's network. Upon receiving written notice from the FCC's Enforcement Bureau regarding illegal traffic, the Company will promptly block and report the identified traffic and any similar ongoing traffic. If, after investigation, the Company determines the traffic is not illegal, it will provide a detailed explanation to the Enforcement Bureau outlining the reasoning and steps taken to reach this conclusion.

Robocall Detection and Prevention Measures

The Company utilizes a combination of internal tools and third-party solutions to check for Do Not Originate (DNO) numbers. In addition, the Company utilizes a combination of internal tools and third-party solutions to detect invalid phone number formats, area codes and unassigned number blocks. The Company also utilizes data analytics to detect and investigate irregular and unexpected calling patterns, originating number use against customer profiles.

Customer Verification Process

The Company uses data systems for analytics and reviews to identify illegal robocalling in addition to a Know Your Customer (KYC) requirement to access the Company's networks. The process includes:

- Monitoring the network to identify suspicious traffic patterns.
- Limiting customers' capacity via call per second and/or concurrent session limits.
- Regularly checking call patterns for possible abusive traffic.
- All new customers are verified with a combination of electronic and manual verification systems, credit reviews, references from trusted industry members, and previous experiences with customer executives and employees. The Company severely limits the capabilities of new accounts until these appropriate processes are complete.

Upstream Voice Traffic Providers

Bay Business Edge receives voice traffic from two upstream providers:

PayG LLC dba SkySwitch
Arborcrest 1, 751 Arbor Way, Suite 150, Blue Bell, PA 19422
Phone: 747.777.8100
Email: support@skyswitch.com

CoreDial LLC
Arborcrest 1, 751 Arbor Way, Suite 150, Blue Bell, PA 19422
Phone: 215.297.4400
Email: cdsupport@skyswitch.com

Traffic Refusal and Blocking Policy

The Company reserves the right to refuse traffic from any party at any time if robocalling, unauthorized use of originating numbers, or use of invalid numbers is detected or suspected. The Company can block originating numbers, terminating numbers, trunks, or customers and may terminate customer relationships to prevent robocalling, invalid originating number usage, or spoofed origination numbers from transiting its networks.