

TRUETONE NETWORKS INC.

Robocall Mitigation Plan

Pursuant to 47 CFR § 64.6305 and FCC Robocall Mitigation Database Requirements

Effective Date: March 25, 2026

COMPANY INFORMATION	
Company Name	Truetone Networks Inc.
Entity Type	C Corporation
State of Formation	Texas
Contact Email	Admin@truetonenetworksinc.com
Service Type	Wholesale VoIP Carrier
Customers Served	Businesses (UCaaS), Call Centers
Plan Effective Date	March 25, 2026
Plan Version	1.0

1. Executive Summary

Truetone Networks Inc. ("Truetone" or "the Company") is a wholesale Voice over Internet Protocol (VoIP) carrier incorporated in the State of Texas. The Company provides wholesale telecommunications services to business customers, including Unified Communications as a Service (UCaaS) providers and call centers operating within the United States.

This Robocall Mitigation Plan ("Plan") has been developed and implemented in accordance with the Federal Communications Commission's (FCC) rules set forth in 47 CFR § 64.6305 and the requirements of the Robocall Mitigation Database. This Plan describes the specific, reasonable steps that Truetone Networks Inc. takes to avoid originating illegal robocall traffic on its network.

Truetone Networks Inc. is committed to maintaining a clean, compliant network and takes its obligations as a voice service provider seriously. The Company recognizes that illegal robocalls cause significant harm to consumers and is dedicated to being a responsible participant in the telecommunications ecosystem.

2. Regulatory Framework and Legal Authority

This Plan is prepared in accordance with the following regulatory authorities and requirements:

- The TRACED Act (Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act), signed into law December 30, 2019
- FCC Report and Order in CG Docket No. 17-59 and EB Docket No. 20-22, establishing the Robocall Mitigation Database
- 47 CFR § 64.6305 — Robocall Mitigation Program requirements for voice service providers
- 47 CFR § 64.1200 — Restrictions on the use of automated telephone equipment
- FCC Second Report and Order (FCC 21-48) requiring filing in the Robocall Mitigation Database
- The Truth in Caller ID Act prohibiting caller ID spoofing with intent to defraud, cause harm, or wrongfully obtain anything of value

As a wholesale VoIP carrier that has not yet fully implemented STIR/SHAKEN call authentication (currently in progress), Truetone Networks Inc. is required to have a robocall mitigation program that includes reasonable steps to avoid originating illegal robocall traffic.

3. Scope and Applicability

This Plan applies to all voice traffic originated, transmitted, or carried on the Truetone Networks Inc. network, including but not limited to:

- All wholesale VoIP traffic originated by business customers (UCaaS providers)
- All wholesale VoIP traffic originated by call center customers
- All interconnected VoIP traffic transiting the Truetone network
- All domestic and international originating traffic carried on behalf of customers

This Plan applies to all employees, contractors, agents, and customers of Truetone Networks Inc. who access, use, or interact with the Company's telecommunications network and services.

4. Customer Onboarding and Due Diligence

4.1 Know Your Customer (KYC) Requirements

Truetone Networks Inc. implements rigorous Know Your Customer procedures for all prospective customers prior to provisioning service. These procedures include:

- Verification of business identity through government-issued documentation, including Articles of Incorporation, Certificate of Formation, or equivalent state filings
- Verification of Employer Identification Number (EIN) or Tax Identification Number (TIN) through IRS documentation
- Collection and verification of physical business address — P.O. Boxes are not accepted as sole address
- Identification of all principals, officers, and beneficial owners of the customer entity
- Review of customer's intended use cases for voice services
- Assessment of expected call volumes and traffic patterns
- Verification that the customer is not on any known bad actor lists, including FCC enforcement action lists and industry blacklists

4.2 Customer Agreements and Acceptable Use Policy

All customers of Truetone Networks Inc. are required to execute a written service agreement that includes a comprehensive Acceptable Use Policy (AUP). The AUP expressly prohibits the following:

- Origination or transmission of illegal robocalls as defined under the Telephone Consumer Protection Act (TCPA), 47 U.S.C. § 227
- Caller ID spoofing with intent to defraud, cause harm, or wrongfully obtain anything of value, in violation of the Truth in Caller ID Act
- Use of auto-dialers or pre-recorded messages to contact wireless numbers, residential lines, or emergency numbers without prior express written consent
- Transmission of calls to numbers on the National Do Not Call Registry without a valid exemption
- Any traffic that violates federal, state, or local telecommunications laws and regulations
- Resale or transfer of Truetone services to any third party without prior written authorization

Customers must affirmatively certify compliance with all applicable laws and regulations upon execution of the service agreement and annually thereafter. Failure to comply with the AUP constitutes grounds for immediate service termination without liability to Truetone Networks Inc.

4.3 High-Risk Customer Enhanced Due Diligence

Customers presenting higher risk profiles — including call centers with high outbound call volumes, auto-dialer users, or customers in industries with historically high rates of consumer complaints — are subject to enhanced due diligence including:

- Verification of TCPA compliance programs and written consent management processes
- Review of calling lists and confirmation that consent documentation exists
- Requirements for real-time call detail record (CDR) reporting
- More frequent monitoring and review cycles
- Potentially requiring a security deposit or prepayment arrangement

5. Network Monitoring and Traffic Analysis

5.1 Real-Time Traffic Monitoring

Truetone Networks Inc. employs continuous, real-time monitoring of call traffic traversing its network. Monitoring activities include:

- Analysis of call volumes per originating customer to detect sudden spikes inconsistent with normal business patterns
- Monitoring of calls per second (CPS) rates to identify automated dialing activity
- Analysis of call duration patterns — unusually high volumes of very short duration calls (under 6 seconds) are flagged as potentially indicative of robocall activity
- Monitoring of answer supervision ratios and ring-no-answer rates
- Geographic analysis of originating and terminating call patterns
- Identification of sequential dialing patterns indicative of number harvesting or auto-dialers

5.2 Automated Alerting and Thresholds

The Company maintains automated alerting systems that generate notifications when traffic patterns exceed defined thresholds. Alert conditions include:

- Customer call volume increases exceeding 300% of the prior 7-day average within any 1-hour period
- Call completion rates dropping below 10% for any customer over a 30-minute window
- Average call duration falling below 10 seconds for more than 20% of a customer's traffic
- High volumes of calls to sequential or numerically adjacent telephone numbers
- Calls originating from or terminating to known high-risk number ranges

5.3 Call Detail Record (CDR) Retention

Truetone Networks Inc. retains Call Detail Records for a minimum of 18 months. CDR data retained includes originating number, terminating number, call duration, timestamp, customer account identifier, and trunk/route information. This data is available for review in response to lawful subpoenas, FCC inquiries, and internal compliance investigations.

6. Caller ID Authentication and STIR/SHAKEN

Truetone Networks Inc. is actively pursuing full implementation of STIR/SHAKEN call authentication in accordance with FCC requirements. The Company's STIR/SHAKEN implementation plan includes:

- Registration with the FCC through CORES and completion of FCC Form 499-A (completed)
- Filing with the FCC Robocall Mitigation Database (in progress)
- Obtaining an Operating Company Number (OCN) from NECA (pending)
- Registration with the SHAKEN Policy Administrator (STI-PA) operated by iconectiv (pending)
- Obtaining SHAKEN certificates from an authorized Certificate Authority (pending)
- Implementation of STIR/SHAKEN signing on all originated traffic upon technical readiness

Until full STIR/SHAKEN implementation is complete, Truetone Networks Inc. implements the robocall mitigation measures described in this Plan as a substitute program in accordance with 47 CFR § 64.6305(b).

The Company does not knowingly originate, carry, or pass traffic with invalid, missing, or spoofed caller ID information. Customers are contractually required to ensure that all caller ID information transmitted through Truetone's network accurately reflects the originating party or a telephone number over which the customer has legal authority.

7. Response to Complaints and Enforcement Actions

7.1 Complaint Handling Process

Truetone Networks Inc. maintains a dedicated process for receiving, investigating, and responding to complaints related to illegal robocall traffic. The complaint handling process includes:

- Designation of a Robocall Compliance Officer responsible for overseeing complaint investigations
- Acknowledgment of all complaints within one (1) business day of receipt
- Initiation of a traffic investigation within two (2) business days of complaint receipt

- Customer notification within three (3) business days when a complaint is attributable to a specific customer account
- Documentation of all complaints, investigations, and resolutions in a compliance log
- Escalation procedures for repeat offenders or high-volume illegal traffic complaints

7.2 Response to FCC and Industry Traceback Requests

Truetone Networks Inc. is committed to full cooperation with the FCC, the Industry Traceback Group (ITG), and other authorized entities conducting traceback investigations of illegal robocall campaigns. The Company will:

- Respond to all traceback requests from the ITG within 24 hours of receipt
- Provide complete and accurate call detail records as requested within the scope of applicable law
- Cooperate fully with FCC investigations and respond to all official correspondence within required timeframes
- Immediately notify the relevant customer of any traceback or enforcement inquiry attributable to their traffic
- Take immediate action to block or terminate traffic identified as illegal through a traceback investigation

7.3 Customer Suspension and Termination

Truetone Networks Inc. maintains a zero-tolerance policy for customers found to be originating illegal robocall traffic. Upon confirmation of illegal traffic, the Company will:

- Issue an immediate warning and traffic suspension for first-time violations pending investigation
- Terminate service without notice for confirmed, willful violations of the AUP or applicable law
- Report confirmed bad actors to industry databases and, where appropriate, to law enforcement
- Refuse to reinstate service to terminated customers without documented remediation and executive approval

8. Blocking and Mitigation Measures

Truetone Networks Inc. implements the following technical measures to block or mitigate illegal robocall traffic on its network:

- Implementation of network-level blocking of calls from known bad actor numbers and number ranges as published by the FCC and industry authorities

- Rate limiting of outbound calls per customer account to prevent burst dialing activity inconsistent with normal business operations
- Blocking of calls originating from unallocated or invalid North American Numbering Plan (NANP) numbers
- Blocking of calls with obviously spoofed caller ID, including calls using numbers designated as invalid by NANPA
- Implementation of STIR/SHAKEN verification on incoming traffic where technically feasible to identify calls with failed or missing attestation
- Participation in industry call blocking programs and databases as they become available

The Company reviews and updates its blocking rules on at least a monthly basis and immediately upon receipt of credible information about new illegal robocall campaigns.

9. Upstream Provider Requirements

When Truetime Networks Inc. receives traffic from upstream voice service providers or intermediate carriers, the Company implements the following measures:

- Execution of written interconnection agreements with all upstream providers that include representations and warranties regarding traffic compliance
- Requirements that upstream providers certify compliance with applicable FCC robocall mitigation rules
- Monitoring of traffic received from upstream providers for indicators of illegal robocall activity
- Notification to upstream providers when illegal traffic is traced back to their network
- Right to terminate interconnection agreements with upstream providers that repeatedly pass illegal robocall traffic

Truetime Networks Inc. does not knowingly accept traffic from providers that have been identified by the FCC as non-compliant with robocall mitigation requirements or that have been subject to enforcement action for illegal robocall activity.

10. Employee Training and Compliance Culture

Truetime Networks Inc. is committed to building and maintaining a culture of compliance throughout the organization. Training and compliance measures include:

- Initial training for all employees involved in customer onboarding, network operations, and compliance on FCC robocall mitigation rules and requirements
- Annual refresher training on updates to applicable laws, FCC rules, and industry best practices
- Designation of a Robocall Compliance Officer with primary responsibility for maintaining this Plan and ensuring its implementation

- Regular review of this Plan by senior management, at minimum annually and upon any material changes in FCC rules or company operations
- Clear escalation paths for employees to report suspected violations without fear of retaliation

11. Plan Review and Updates

Truetone Networks Inc. will review and update this Robocall Mitigation Plan no less frequently than annually. The Plan will also be updated:

- Upon any material changes in FCC rules or guidance regarding robocall mitigation
- Following any significant enforcement action or industry development affecting the Company's obligations
- When changes to the Company's network, services, or customer base materially affect the risk profile of the Company's traffic
- Upon implementation of STIR/SHAKEN call authentication, at which time this Plan will be updated to reflect full STIR/SHAKEN compliance

Updated versions of this Plan will be filed with the FCC Robocall Mitigation Database within the timeframes required by applicable rules.

12. Certification

I, the undersigned, am an officer of Truetone Networks Inc. and am authorized to make this certification on behalf of the Company. I certify that:

- Truetone Networks Inc. has implemented the Robocall Mitigation Program described in this Plan
- The information contained in this Plan is true, accurate, and complete to the best of my knowledge
- Truetone Networks Inc. is in compliance with all applicable FCC rules regarding robocall mitigation
- The Company will update this Plan and its filing in the FCC Robocall Mitigation Database as required by applicable rules
- I understand that false statements in this certification may subject the Company and its officers to penalties under 47 U.S.C. § 220 and other applicable laws

Authorized Signature:

Raul Saenz

Raul Saenz (Mar 25, 2026 16:02:47 MDT)

Date:

25/03/2026

Printed Name: Raul Saenz	Title: President
Company Name: Truetone Networks Inc. 17350 State Hwy 249, Ste 220, Houston, TX 77064	

Appendix A: Contact Information for Compliance Inquiries

COMPLIANCE CONTACT INFORMATION	
Company	Truetone Networks Inc.
Compliance Email	Admin@truetonenetworksinc.com
Mailing Address	17350 State Hwy 249, Ste 220, Houston, TX 77064
FCC Robocall DB	https://fccrobocallmitigation.fcc.gov
ITG Traceback Contact	Admin@truetonenetworksinc.com

Appendix B: Key Regulatory References

- 47 CFR § 64.6305 — Robocall Mitigation Program
- 47 CFR § 64.1200 — Restrictions on automated telephone equipment (TCPA)
- 47 U.S.C. § 227 — Telephone Consumer Protection Act
- 47 U.S.C. § 227b — STIR/SHAKEN implementation
- FCC Robocall Mitigation Database: fccrobocallmitigation.fcc.gov
- Industry Traceback Group: www.tracebackgroup.com
- FCC Enforcement Bureau: www.fcc.gov/enforcement
- NANPA (North American Numbering Plan Administration): www.nanpa.com