

# **SCHWARTZ COMMUNICATIONS**

## **ROBOCALL MITIGATION PLAN**

Schwartz Communications is a Voice over Internet Protocol (VoIP) provider that offers interconnected VoIP services to its subscribers on a resold basis. Schwartz Communications utilizes wholesale VoIP providers that are well-known, reputable service providers registered in the FCC's Robocall Mitigation Database.

While Schwartz Communications relies on the robocall mitigation policies, procedures, and safeguards implemented by its upstream providers, it 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. These measures are intended to prevent the transmission of such traffic across upstream and downstream networks.

### **Know-Your-Customer Policies**

***Subscriber Vetting:*** Schwartz Communications vets the identity of its customers when approving applications for telephone service. As part of this process, Schwartz Communications collects the customer's legal name, address, physical service location, and contact information. For commercial customers, additional information such as a federal tax identification number may be required. Schwartz Communications may request further documentation as necessary to validate a customer's identity prior to provisioning service. Service will not be provided if a customer's identity cannot be verified.

***Contractual Terms:*** Schwartz Communications' Telecommunications Voice Service Agreements prohibit the use of its services for any illegal or fraudulent purpose, including the origination of unlawful robocalls. These agreements provide that Schwartz Communications may suspend or terminate services if it determines that a customer's use of the services violates the applicable terms.

### **Use of Call Analytics to Identify and Block Unlawful Traffic**

Schwartz Communications relies on its upstream providers' use of call analytics systems to identify and block unlawful robocall traffic, as described in their robocall mitigation plans on file with the FCC. These analytics systems are designed to detect call patterns indicative of potential robocall activity, including, but not limited to, unusually high call volumes from a single source, excessive short-duration calls, calls that terminate after a single ring, and calls originating from invalid, unallocated, or Industry Traceback Group ("ITG") Do Not Originate ("DNO") listed numbers.

If Schwartz Communications receives a report or alert of suspected unlawful robocall traffic originating from one of its end-user customers, it will promptly conduct an investigation. If a customer is found to have violated Schwartz Communications' Service Agreements, appropriate action will be taken based on the severity of the violation, including, but not limited to, issuing a warning or terminating the customer's service.

### **Knowledge of Upstream Providers**

Schwartz Communications utilizes upstream wholesale service providers that are registered in the FCC's Robocall Mitigation Database and are recognized as reputable carriers. While Schwartz Communications does not have direct visibility into all upstream providers from which traffic is received, it relies on its direct upstream providers' representations that they maintain compliant robocall mitigation programs. These providers have certified to the FCC that they implement policies and procedures to identify and block unlawful robocall traffic within their networks.

### **Cooperation with the Traceback Group, Law Enforcement and Government Agencies**

Schwartz Communications 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 originating from its customers.

Schwartz Communications is also committed to cooperating fully with its upstream providers in responding to traceback requests and to complying with all applicable FCC robocall mitigation and blocking requirements. Schwartz Communications understands that its upstream providers implement call blocking measures consistent with FCC rules, including blocking calls or provider traffic that: (1) are identified in any public notice or order issued by the FCC; (2) are substantially similar to the types of traffic identified in such notices or orders; or (3) include caller ID numbers or names listed on the ITG Do Not Originate (DNO) list.