



**668 Columbia Turnpike
East Greenbush, NY 12061
855-776-7662**

Proper Mobile Robocall Mitigation Plan

Proper Mobile utilizes AT&T Cellular network, which is fully compliant with the FCC's stir/shaken requirements. We fully utilize as well as rely on a compliant upstream provider to authenticate and sign traffic.

The FCC Order lists three affirmative obligations for voice service providers: (1) Respond to traceback requests from the Commission, civil and criminal law enforcement, or the Industry Traceback Consortium; (2) Take steps to effectively mitigate illegal traffic when it receives notification of such traffic from the Commission through its enforcement bureau; and (3) implement effective measures to prevent new and current customers from using its network to originate illegal calls.

Proper Mobile agrees to comply with efforts to traceback the source of suspected robocalls.

- We cooperate with traceback requests received directly from carriers, industry associations, and law enforcement.
- Call records are created for all calls and are searchable.

Proper Mobile has implementing the following steps to mitigate and avoid illegal robocall traffic originating from its customers:

- All new subscribers are vetted during the onboarding process.
- PM does not sell voice services outside the United States.
- PM monitors voice traffic to ensure originating traffic is valid.
- PM is also in the process of implementing mitigation requirements with its provider.

Proper Mobile Robocall Mitigation Plan

This document provides details on Proper Mobile's robocall mitigation processes, procedures, and commitments as required by the Federal Communications Commission. Proper Mobile currently provides cellular service to 195 customers utilizing AT&T's network.

Robocall Mitigation Plan

Reasonable Steps

Proper Mobile monitors all originating network traffic call detail records for suspicious or abnormal call pattern, volume, or activity. Calls that meet the below qualifying factors are analyzed internally to determine if the calls are legitimate or unlawful:

- High-volume voice network traffic
- Large bursts of calls in a short time frame
- Short duration calls
- Low average call duration
- Low call completions ratios
- Sequential dialing patterns
- Neighbor spoofing patterns

PM retains the originating and terminating call detail usage records for a minimum of 36 months.

Investigation

PM investigates calls identified by internal traffic monitoring processes as suspicious or abnormal consistent with illegal robocalls.

As of this filing PM has not had any originating robocalls detected in its network by the internal analytics. Nor has PM received any complaints from its customers.

Enforcement

If it is determined that a Proper Mobile customer is in violation of its acceptable use policy in any part of its network, PM will either warn the customer to stop such practices or terminate their service.

Know Your Customer

PM has procedures in place to prevent new and renewing customers from using our network to originate illegal robocalls. Proper Mobile vets all residential and business customers, validates their identity, physical location, and contact personal information. Also, personally identifiable questions may be asked to provide additional security.

Contractual Provisions with End-users

All new customers acknowledge a statement on the service application which states users are prohibited from originating unwanted calls with the intent to defraud, cause harm, or wrongly obtain anything of value from the called party. If any customer is found in violation of the company's robocall mitigation policy the end users service may be terminated.

Upstream Provider Knowledge

PM knows all carriers from which it receives traffic. P M has confirmed that all carriers in which Proper Mobile exchanges traffic are listed in the Robocall Mitigation Database. Proper Mobile has reviewed the connected carrier's RMPs to learn how the carriers monitor their originating traffic to mitigate illegal robocalls.

Traceback

PM is committed to cooperation with all legal and legitimate industry inquiries to potential invalid or illegal traffic originating from its network. Proper Mobile will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium fully and in a timely manner within 24 hours.

Robocall Mitigation Database Eligibility

PM has not been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling.

PM has not been prohibited from filing in the Robocall Mitigation Database (RMD).