

FONUS INC.

Robocall Mitigation Plan

INTRODUCTION

This Robocall Mitigation Plan is submitted by Fonus Inc. (Fonus) pursuant to the provisions of 47 C.F.R. § 64.6305, adopted by the Federal Communications Commission (FCC) which require all “voice service providers” to establish a “robocall mitigation plan”. This document sets forth the Fonus’ current policies and procedures designed to minimize or eliminate the possibility of outbound illegal robocalls originating on its network. Fonus views these policies and procedures as constituting “reasonable steps” to avoid the origination of illegal robocalls on its network. In addition to following these steps, Fonus commits to responding to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG), and to cooperate with such entities in investigating and stopping any illegal robot callers that may use its service to originate calls.

STIR/SHAKEN IMPLEMENTATION

Fonus has implemented STIR/SHAKEN throughout its network in full compliance with ATIS standards. All calls originated by Fonus customers are signed with full (“A”) attestation through Fonus’ upstream provider, Sinch Inc. STIR/SHAKEN uses digital certificates based on common public key cryptography techniques to ensure the calling number of a telephone call is secure, enabling the called party to verify that the calling number is accurate and has not been spoofed.

KNOW YOUR CUSTOMER PROCEDURES

All prospective customers are required to provide accurate information including full name, billing address, email address and credit card information during the account setup process. Fonus conducts manual spot checks to verify customer identity and confirm the legitimacy of the identity prior to and during the provision of service. Customers who cannot be verified as legitimate are denied access to Fonus’ services. Fonus prohibits outbound marketing campaigns for all customers and will discontinue services if such campaigns are discovered, even if the originating number is not flagged as spam. Fonus will promptly disable customers from placing outbound robocalls that are in violation of the policies set forth.

KNOW YOUR UPSTREAM PROVIDER

Fonus’ upstream provider in the United States is Sinch America Inc., which is registered in the Robocall Mitigation Database (“RMD”) with registration number RMD0018645. Fonus only accepts traffic from upstream providers that are listed in the Robocall Mitigation Database. Sinch America Inc. maintains its own call analytics monitoring systems for the detection of illegitimate traffic. Should Sinch America Inc. detect suspicious activity, Fonus will work directly with them to identify any corresponding account and follow the same process to immediately suspend the account and subsequently terminate the account in accordance with Fonus’ Terms of Service.

CUSTOMER COMPLIANCE WITH ROBOCALLING RULES AND EXISTING LAW

Fonus requires all customers to comply with its Terms of Service, which generally prohibit robocalling, automated calling of any kind, or other unlawful calling practices under applicable federal and state law, including the Telephone Consumer Protection Act (“TCPA”) and FCC rules and regulations. Additionally, Fonus’ services are architected such that caller ID spoofing is not technically possible, further ensuring that customers are unable to engage in one of the most prevalent forms of illegal robocall activity. Any customer found to be in violation of Fonus’ Terms of Service is subject to immediate suspension and subsequent termination of service if such violation is left uncured.

ANALYTICS & MONITORING

Fonus actively monitors call traffic across its network for signs of suspicious or illegal activity. Fonus' monitoring program includes both call volume threshold analysis and suspicious calling pattern detection. When potentially suspicious activity is identified, Fonus promptly investigates and takes appropriate action, up to and including immediate suspension of the offending account and eventual termination if left uncured.

INCIDENT RESPONSE AND TRACEBACK REQUESTS

Fonus commits to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium. When a traceback request is received or a credible complaint is brought to Fonus' attention, Fonus promptly investigates the suspect traffic to determine the call path(s) and whether the traffic is likely to constitute illegal robocalling. If a customer is found to be engaging in illegal robocalling or any other prohibited calling activity, Fonus will immediately suspend that customer's access to its services upon discovery. Fonus will terminate customer access to its services in accordance with Fonus' Terms of Service if Customers are found to be engaging in illegal activities. In addition to Fonus' own monitoring, Sinch America Inc. also maintains call analytics monitoring systems for the detection of illegitimate traffic. Should Sinch America Inc. detect suspicious activity, Fonus will work directly with them to identify the corresponding account and take immediate action as set out above.

PRINCIPALS, AFFILIATES, SUBSIDIARIES & PARENT COMPANIES

Fonus Inc. is a Delaware corporation based in Los Angeles, California. Simon Tian is the Chief Executive Officer and the sole director of Fonus Inc. Fonus Inc. has no other affiliates or subsidiaries that independently meet the definition of a voice service provider, intermediate provider, or gateway provider. Neither Fonus Inc. nor any of its principals have been subject to a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

TRACEBACK REQUEST SINGLE POINT OF CONTACT

Name: Simon Tian

Title: Owner & CEO

Phone Number: 438-600-6926

Email Address: simon@fonusmobile.com