

## **Ohio Business Machines Robocall Mitigation Compliance with TRACED Act**

Ohio Business Machines, a subsidiary of Donnellon McCarthy Enterprises, (the “Company”) is committed to cooperating with the Federal Communications Commission (FCC), law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that it learns are using our service to originate calls or transit calls into the United States and territories.

The Company is a reseller of voice services hosted on VoIP platforms by PayG LLC dba SkySwitch and do not have the capability to implement STIR/SHAKEN. PayG LLC dba SkySwitch has implemented STIR/SHAKEN protocols in their IP Voice networks (RMD0002940).

The Company commits to fully responding within 24 hours to all traceback requests from the ITG, the TPTG, the FCC, and law enforcement. The Company shall cooperate with these groups to investigate and stop any illegal robocallers from using Company’s service to carry or process illegal calls. When notified by the FCC’s Enforcement Bureau, Company shall block and report identified illegal traffic, and any substantially similar traffic, on an ongoing basis (unless Company’s investigation determines that the traffic is not illegal) when Company receives actual written notice of such traffic from the Enforcement Bureau. If Company determines that the identified traffic is not illegal, Company shall provide the Enforcement Bureau with an explanation as to why Company reasonably concluded that the identified traffic is not illegal, and what steps it took to reach that conclusion.

The Company utilizes a combination of internal tools and third-party solutions to check for Do Not Originate (DNO) numbers. All detection and mitigation of robocalling is handled by our platform provider Skyswitch. Their tools and methods of preventing robocalling are ours, and their current and accepted RMD filing can be found here: [Robocall Mitigation Database Form - Robocall Mitigation Database](#)

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.

Ohio Business Machines has two upstream providers from which it receives voice traffic:

1. PayG LLC dba SkySwitch Arborcrest 1, 751 Arbor Way Suite 150 Blue Bell, PA 19422

Phone: 747.777.8100 Email: [support@skyswitch.com](mailto:support@skyswitch.com)

2. CoreDial LLC Arborcrest 1, 751 Arbor Way Suite 150 Blue Bell, PA 19422 Phone:

215.297.4400 Email: [cdsupport@skyswitch.com](mailto:cdsupport@skyswitch.com)

The Company reserves the right to refuse traffic from any party at any time where robocalling or use of originating numbers that are not valid or they are not authorized to use has occurred or is suspected. The Company is able to block the originating number(s), terminating numbers(s), trunk(s) or customer, including termination of customer relationship to prevent robocalling, invalid originating number or spoofed origination number transiting the Company's networks.

Donnellon McCarthy Enterprises

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Ohio Business Machines

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