

TALKATO SELECT LLC

ROBOCALL MITIGATION PLAN

Company Information

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1. Company Commitment

Talkato Select LLC is committed to maintaining a secure and compliant telecommunications environment by implementing effective robocall mitigation procedures, customer verification standards, traffic monitoring controls, and regulatory compliance measures. The Company actively works to prevent the transmission of unlawful robocalls, caller ID spoofing, fraudulent traffic, and other forms of prohibited communications activity.

This Robocall Mitigation Plan outlines the policies and operational practices implemented to comply with FCC regulations and industry standards.

2. Scope of the Program

This program applies to all traffic that originates from, transits through, or terminates on the Talkato Select LLC network, including traffic exchanged with customers, interconnected carriers, resellers, and wholesale partners.

The objectives of this program include:

- Reducing illegal robocall activity
- Preventing caller ID spoofing
- Supporting traceback investigations
- Protecting consumers and carriers from fraud
- Maintaining regulatory compliance
- Preserving network integrity

3. Regulatory Compliance Standards

Talkato Select LLC operates in accordance with applicable telecommunications regulations and industry requirements, including:

- Telephone Consumer Protection Act (TCPA)
- TRACED Act
- Truth in Caller ID Act
- FCC Robocall Mitigation Database Requirements

- FCC Caller Authentication Rules
- STIR/SHAKEN Framework
- USTelecom Industry Traceback Group Guidelines

The Company maintains procedures designed to ensure compliance with evolving regulatory obligations.

4. Customer Verification Program

Prior to service activation, prospective customers undergo a verification process designed to confirm legitimacy and reduce risk.

Verification procedures may include:

- Business registration review
- EIN validation
- FRN verification
- FCC Form 499 verification
- Address confirmation
- Contact verification
- Review of intended service usage
- Traffic risk assessment

Customers unable to satisfy verification requirements may be denied service.

5. Caller Authentication and Number Validation

Talkato Select LLC supports caller authentication initiatives designed to improve trust in telecommunications networks.

Attestation decisions are based upon:

- Customer identity verification
- Number assignment records
- Authorization to use telephone numbers
- Compliance history

Traffic presenting elevated risk indicators may be restricted, reviewed, or blocked.

6. STIR/SHAKEN Attestation Policy

A-Level Attestation

A-Level Attestation may be assigned when:

- Customer identity has been verified
- Numbers are assigned directly by Talkato Select LLC
- The Company maintains a direct relationship with the caller

B-Level Attestation

B-Level Attestation may be assigned when:

- Customer identity has been verified
- Right-to-use documentation is available

- Number ownership has been reasonably validated

C-Level Attestation

Traffic received with C-Level Attestation may be subject to enhanced review, risk evaluation, and monitoring before routing.

7. Traffic Monitoring Controls

The Company employs monitoring tools and operational controls to identify suspicious calling activity.

Indicators reviewed include:

- Abnormal traffic volume increases
- Excessive short-duration calls
- Unusual call completion patterns
- Caller ID anomalies
- Spoofing indicators
- High complaint activity • Traceback notifications

Traffic anomalies are investigated promptly.

8. Prohibited Activities

The following activities are prohibited:

- Illegal robocalling
- Caller ID spoofing
- Scam campaigns
- Fraudulent traffic generation
- Phishing activity
- Traffic without lawful consent
- Violations of TCPA requirements
- Violations of federal or state telecommunications regulations

Violations may result in enforcement action.

9. Enforcement Procedures

Talkato Select LLC maintains a graduated enforcement process.

Level One – Compliance Notice

The customer receives notification and may be required to provide supporting documentation.

Level Two – Service Restriction

Traffic restrictions or temporary suspension may be imposed pending investigation.

Level Three – Termination

Repeated violations or confirmed unlawful activity may result in permanent service termination.

10. Traceback Cooperation

Talkato Select LLC cooperates with:

- USTelecom Industry Traceback Group
- Federal Communications Commission
- State and Federal Law Enforcement Agencies
- Authorized Industry Stakeholders

Traceback requests are prioritized and investigated promptly.

11. Complaint Handling

Customer complaints, carrier notifications, traceback requests, and fraud reports are reviewed as part of ongoing compliance operations.

Complaint information may be used to identify trends and improve mitigation effectiveness.

12. Continuous Compliance Oversight

The Company regularly evaluates:

- Traffic monitoring effectiveness
- Customer verification procedures
- Compliance controls
- Fraud prevention tools
- Regulatory developments

Program improvements are implemented when necessary.

13. Resource Allocation

Talkato Select LLC allocates personnel, technology, and operational resources to support compliance obligations, monitoring activities, investigations, and traceback responses.

14. Record Retention

Records supporting compliance activities are maintained for a minimum of two years or longer when required by law.

Records may include:

- Call Detail Records (CDRs)
- Customer verification files
- Traceback requests and responses
- Compliance reviews
- Traffic investigations
- Enforcement actions
- Complaint records

15. Certification

Talkato Select LLC certifies that it maintains a robocall mitigation program designed to prevent the transmission of unlawful robocall traffic and to comply with applicable FCC requirements.

Authorized Representative

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