



The Company has established and maintains a robocall mitigation program designed to prevent its network and services from being used to originate illegal robocalls, unlawful spoofed calls, or other unlawful voice traffic.

****Customer Identification and Know-Your-Customer Procedures****

Before activating service for a new customer, and as appropriate when renewing or reviewing an existing customer, the Company takes reasonable measures to identify and verify the customer. Such measures may include verification of the customer's legal or business name, address, telephone number, email address, billing information, business purpose, and other identifying information.

Customers are required to use the Company's services in compliance with applicable federal and state laws and FCC regulations. Customers are prohibited from using the Company's network for illegal robocalling, fraudulent calling, unlawful telemarketing, or unlawful caller-ID spoofing.

Customers may only transmit telephone numbers and caller ID information that they own, control, or are otherwise authorized to use.

****Traffic Monitoring and Call Analytics****

The Company monitors outbound calling activity using its internal network management, CDR, billing, and fraud-monitoring systems.

The Company reviews traffic for unusual or potentially abusive calling patterns, including abnormal increases in call volume, unusually high concurrent call activity, repeated short-duration calls, unusual destination patterns, excessive changes in originating caller ID numbers, customer complaints, carrier complaints, traceback notifications, and other indicators of potentially unlawful traffic.

When suspicious traffic is detected, the Company may investigate the customer and calling activity, restrict calling capabilities, impose traffic limits, block particular calling patterns or caller ID numbers, temporarily suspend service, or terminate the customer when appropriate.

The Company does not knowingly permit customers to originate illegal robocalls or unlawfully spoofed calls through its network.

****Caller ID Controls****

The Company requires customers to use valid caller identification information and prohibits the intentional alteration or manipulation of caller ID information for fraudulent or unlawful purposes.

When the Company becomes aware that a customer is transmitting telephone numbers that the customer is not authorized to use, the Company may block the affected traffic and suspend or terminate the customer's service.

****Upstream Provider Procedures****

The Company uses established telecommunications carriers and service providers for the exchange and termination of voice traffic. The Company maintains identifying and contact information for its upstream providers and takes reasonable measures to ensure that providers with which it directly exchanges covered traffic have the appropriate regulatory authorization and Robocall Mitigation Database status when required.

The Company cooperates with its upstream providers in investigations involving suspected illegal calling activity.

****Complaints and Illegal Traffic Investigations****

The Company investigates credible complaints, traceback requests, carrier notifications, and government or law-enforcement notifications concerning suspected illegal robocall traffic.

When illegal or suspicious traffic is identified, the Company takes reasonable and appropriate corrective measures, which may include blocking the traffic, restricting the customer's calling capabilities, requesting additional information from the customer, suspending service, or terminating the responsible account.

The Company maintains relevant customer and call-detail information necessary to investigate complaints and traceback requests, consistent with applicable law and Company record-retention policies.

****Traceback Cooperation****

The Company commits to respond fully and within 24 hours to traceback requests received from the Federal Communications Commission, law enforcement agencies, and the Industry Traceback Group or other Commission-designated industry traceback consortium.

The Company will cooperate with such entities in identifying, investigating, mitigating, and stopping illegal robocallers using the Company's services and will provide relevant information reasonably available to the Company in response to such requests.

****Continuing Mitigation****

The Company periodically reviews its robocall mitigation procedures and will modify or strengthen its procedures when necessary based upon identified traffic patterns, complaints, traceback requests, regulatory requirements, and other indications of abusive or unlawful calling activity.