

ROBOCALL MITIGATION PLAN

Singlesource IT, LLC

148 North High Street

Gahanna, OH 43230, USA

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1. Company and Call-Chain Role

Singlesource IT, LLC is headquartered at 148 North High Street, Gahanna, Ohio 43230. Its customer service environment includes cloud-hosted phone systems, SIP/DID services, E911, SIP channel services, and managed services.

For purposes of this plan, Singlesource IT maintains a voice-service-provider role for the communications services it provides to customers. Where Singlesource IT originates calls and is required to authenticate them, it will use STIR/SHAKEN once its certificate and technical implementation are complete. Where it handles applicable intermediate traffic, it will apply controls appropriate to that role.

2. Compliance Status and Program Commitment

Singlesource IT, LLC maintains this Robocall Mitigation Plan to document the affirmative measures it uses to prevent the origination and transit of illegal robocalls and unlawful spoofing.

Singlesource IT has an assigned Operating Company Number (OCN) 265H . Its current STIR/SHAKEN implementation status is NO because the company has not yet obtained its STI-CA certificate and is not yet representing that it has active certificate-based signing capability.

Following adoption of this plan, Singlesource IT will proceed with the STI-CA process and will update its Robocall Mitigation Database information and this plan when its STIR/SHAKEN implementation becomes operational.

3. Know Your Customer (KYC)

Singlesource IT will vet new and renewing customers before providing voice services and will maintain an authenticated relationship with each customer. The process will include, as applicable:

- Legal business name and DBA information;
- Responsible contact or account manager information;
- Physical business or service location;



- Federal Tax ID/EIN when applicable;
- Customer contact information;
- Telephone numbers requested for use and, when reasonably available, evidence of the customer's legitimate right to use those numbers.

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4. Customer Contractual Controls

Customer agreements will prohibit the use of Singlesource IT services to originate, transmit, or facilitate illegal robocalls, unlawful spoofing, fraudulent traffic, or other prohibited calling activity.

If suspicious traffic is identified, Singlesource IT will investigate the activity and may require the customer to stop the traffic. Continued unlawful or suspicious activity may result in number blocking, calling restrictions, suspension, or termination of service.

5. Know Your Upstream Provider

Singlesource IT identifies its upstream voice carrier as Flowroute, a BCM One Cloud Communications, LLC company.

Singlesource IT will maintain records identifying its upstream provider and its role in the call path. Before accepting or routing voice traffic through an upstream provider, Singlesource IT will evaluate the provider's Robocall Mitigation Database status and applicable mitigation practices to the extent available and appropriate.

Singlesource IT will cooperate with Flowroute and other providers in traceback investigations and mitigation of suspected illegal robocall traffic. If an upstream relationship is determined to present an unacceptable robocall risk, Singlesource IT may restrict or discontinue the associated traffic or relationship, consistent with its contractual and regulatory obligations.

6. Robocall Monitoring and Mitigation

Singlesource IT will use available call analytics and traffic-monitoring capabilities to identify patterns consistent with illegal robocalls, spoofing, or fraudulent traffic. Monitoring will focus on:

- High-volume or abnormal traffic spikes;
- Invalid or unallocated calling numbers;
- Numbers appearing on Do Not Originate lists where applicable;
- Poor-reputation numbers and unusual calling patterns;



- Suspected spoofing or unauthorized use of telephone numbers;
- Unusual destination or termination patterns.

7. STIR/SHAKEN

Singlesource IT has an OCN and will obtain its STIR/SHAKEN certificate through an authorized STI Certification Authority (STI-CA). After issuance and technical implementation, Singlesource IT will use STIR/SHAKEN to authenticate applicable outbound calls that it originates and will assign the appropriate attestation level based on the verified customer relationship and legitimate use of the calling number.

After implementation is completed, Singlesource IT will update its RMD filing and this plan with the actual STI-CA, certificate, and related implementation details.

8. Traceback and Law-Enforcement Cooperation

Singlesource IT will cooperate with the FCC, law enforcement, and the registered traceback consortium in investigating suspected illegal robocalls. The company will maintain sufficient customer, calling-number, routing, and traffic records to identify the source of calls originated or carried through its network, subject to applicable legal and privacy requirements.

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Singlesource IT will respond to traceback requests within 24 hours and will cooperate in investigating and stopping illegal robocall activity.

9. Incident Response

Singlesource IT will use the following process when suspected illegal robocalling is identified:

- Identify the customer, account, telephone number, trunk, and relevant traffic pattern.
- Review authentication, number ownership, volume, destinations, and available analytics.
- Determine whether the traffic appears legitimate or unlawful.
- Apply immediate mitigation when warranted, including blocking or restricting traffic.
- Notify the customer or upstream provider and require corrective action when appropriate.
- Suspend or terminate service when unlawful traffic continues or circumstances warrant.
- Preserve relevant records and cooperate with traceback or regulatory inquiries.

10. Records and Program Governance



Singlesource IT will maintain records supporting KYC procedures, customer agreements, telephone-number assignments, upstream-provider relationships, STIR/SHAKEN authentication, robocall alerts, investigations, enforcement actions, and traceback responses.

The program will be reviewed periodically and updated when material changes occur to the company's voice network, upstream providers, authentication implementation, monitoring controls, or regulatory obligations.

11. Service Environment

Singlesource IT customer billing records document a cloud-hosted phone system, SIP/DID numbers, E911, SIP channel services, and managed services. These services form part of the company's managed communications environment and are therefore considered in this mitigation program.

12. Certification Statement

Singlesource IT, LLC maintains this Robocall Mitigation Plan to document the affirmative measures it uses to prevent the origination and transit of illegal robocalls. The company will maintain reasonable KYC, upstream provider, traffic-monitoring, STIR/SHAKEN, traceback, and enforcement controls appropriate to its role in the voice call chain.

