

Bing Enterprises, Inc.

DBA: Aloha Tone

FRN: 0030842355

OCN: 859L

Robocall Mitigation Plan

Updated and Effective Date: February 19, 2026

Plan Update Notice

This document constitutes an updated Robocall Mitigation Plan filed as of February 19, 2026. This update reflects Bing Enterprises, Inc.'s full implementation of STIR/SHAKEN call authentication, including active signing of outbound calls using our authorized STI certificate through the Telonium authentication proxy.

This update also clarifies our attestation practices, authentication architecture, and robocall mitigation program in accordance with FCC requirements, including 47 CFR § 64.6301 and § 64.6305.

Bing Enterprises, Inc. acknowledges that on August 25, 2025, we were temporarily removed from the FCC Robocall Mitigation Database due to an administrative oversight involving outdated contact information, which resulted in failure to receive a deficiency notice. We acknowledge and regret this administrative oversight.

This issue was promptly corrected, and Bing Enterprises, Inc. was reinstated in the Robocall Mitigation Database on August 28, 2025. We have since implemented internal administrative controls to ensure all regulatory filings, contact information, and compliance obligations remain current. Bing Enterprises, Inc. is committed to maintaining full compliance, and this oversight will not occur again.

Company Information and Role in Call Chain

This Robocall Mitigation Plan applies to Bing Enterprises, Inc. (dba Aloha Tone), headquartered at:

518 Holokahana Lane
Honolulu, Hawaii 96813

Bing Enterprises, Inc. operates as a voice service provider serving authenticated end-users and originating calls onto the public switched telephone network (PSTN).

Our role in the call chain includes:

- Originating calls from authenticated end-users on our network
- Assigning and managing telephone numbers for customers
- Delivering outbound calls to downstream carrier partners
- Authenticating outbound calls using the STIR/SHAKEN framework

Bing Enterprises, Inc. originates calls solely on behalf of authenticated customers with verified identity and authorization. We do not originate traffic on behalf of unauthenticated wholesale providers or unaffiliated third parties.

Our downstream carrier partners include:

- Inteliquent (RMD0002029)
- Bandwidth (RMD0003709)

Neither Bing Enterprises, Inc., nor any of its executives or principals, has been subject to enforcement actions related to illegal robocalls, TCPA violations, TSR violations, or related state laws.

We maintain affirmative and effective procedures to prevent illegal robocalls from originating on our network.

Know Your Customer (KYC) Procedures

Bing Enterprises, Inc. follows industry best practices for verifying customer identity and authorization, consistent with the NANC Call Authentication Trust Anchor Working Group recommendations:

<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>

Our KYC procedures include:

- Verification of customer identity prior to service activation
- Verification of business legitimacy for commercial customers
- Verification that customers are authorized to use telephone numbers presented as caller ID
- Maintenance of accurate customer contact and account records
- Ongoing monitoring of customer call patterns
- Immediate investigation and mitigation of suspicious or unauthorized activity

These controls ensure only authorized and authenticated customers originate calls using our network.

Traceback Cooperation

Bing Enterprises, Inc. fully cooperates with traceback and enforcement authorities.

We respond within 24 hours to traceback requests from:

- The Federal Communications Commission (FCC)
- Law enforcement agencies
- The Industry Traceback Group (ITG)
- The registered traceback consortium

Traceback requests are received and processed through designated regulatory compliance contact channels and monitored compliance systems to ensure timely investigation and response.

We maintain sufficient call detail records and customer identification records to identify call originators and support traceback investigations. Call detail records and associated customer identification records are retained for a minimum of twelve (12) months and are available for regulatory and traceback purposes.

Bing Enterprises, Inc. maintains designated regulatory compliance personnel responsible for traceback response and robocall mitigation compliance.

STIR/SHAKEN Implementation

Bing Enterprises, Inc. has fully implemented STIR/SHAKEN authentication in compliance with:

47 CFR § 64.6301 — Caller ID authentication requirements

Our implementation includes:

- OCN: 859L
- SPC Token issued by the STI Policy Administrator (STI-PA), administered by iConnectiv
- STI certificate issued by Telonium Communications, an authorized STI Certification Authority
- Secure cryptographic key management in accordance with industry standards

Bing Enterprises, Inc. utilizes the Telonium STIR/SHAKEN authentication proxy as our authorized authentication service provider.

Telonium signs and proxies outbound calls on behalf of Bing Enterprises, Inc. using our valid STI certificate.

The authentication process operates as follows:

- Outbound calls originating from Bing Enterprises, Inc. systems are routed to the Telonium authentication proxy
- Only authorized and whitelisted IP addresses are permitted to send calls to the Telonium proxy
- Telonium verifies the caller identity and authorization
- Telonium generates and cryptographically signs a PASSporT token using our STI certificate

- Telonium inserts a properly formatted SIP Identity header containing the PASSporT token into the SIP INVITE
- Telonium proxies authenticated calls to downstream carriers, including Inteliquent, Bandwidth, and Commio
- Telonium signs and authenticates all outbound calls originating from Bing Enterprises, Inc.'s network

Our STI certificate chains to the STI-PA trust anchor administered by iConnectiv, ensuring nationwide trust and verification.

Attestation Practices

Bing Enterprises, Inc. applies STIR/SHAKEN attestation in accordance with ATIS standards, including ATIS-1000080, and FCC guidance.

We primarily apply B-level attestation to outbound calls originating from our network.

B-level attestation is appropriate because:

- We have a direct authenticated relationship with our customers
- We verify customer identity and authorization to originate calls
- We verify the customer is authorized to use the telephone numbers presented as caller ID
- We may not always be the original assignee of the telephone numbers used, particularly in cases involving forwarded calls

In some cases, calls may include caller ID values that represent forwarded calls, including customer mobile numbers or external telephone numbers. Because Bing Enterprises, Inc. may not be the original assignee of those telephone numbers, B-level attestation ensures accurate, truthful, and compliant authentication.

This attestation approach complies with ATIS standards and FCC STIR/SHAKEN requirements.

Network Authentication Architecture

Our authentication architecture includes:

- Use of Telonium's authorized STIR/SHAKEN authentication proxy
- Secure certificate and key management
- PASSporT token generation compliant with ATIS-1000074
- SIP Identity header insertion through authenticated proxy infrastructure
- Strict IP-based access control to authentication services
- Secure delivery of authenticated calls to downstream carriers

This architecture ensures all outbound calls are cryptographically authenticated prior to transmission.

Robocall Mitigation Program

All outbound calls originating on our network are subject to continuous robocall mitigation controls in compliance with 47 CFR § 64.6305.

Our mitigation program includes:

Fraud Detection

Monitoring for high-volume robocalling, spoofing, and suspicious calling patterns.

Caller Authentication and Number Verification

Ensuring customers are authorized to use telephone numbers presented as caller ID.

Traffic Monitoring

Real-time monitoring for anomalous or abusive calling behavior.

Call Blocking and Prevention

Blocking unauthorized, fraudulent, or illegal calls.

Business Number Verification

Verifying legitimate business caller identity.

Caller ID Integrity Controls

Preventing unauthorized caller ID spoofing.

Do-Not-Originate Controls

Blocking calls from invalid, unassigned, or unauthorized numbers.

Call Abuse Policy

Bing Enterprises, Inc. enforces a strict Call Abuse Policy.

Calls suspected of being fraudulent, illegal, or abusive may be investigated, blocked, and mitigated.

Customers originating illegal or unauthorized calls may have service suspended or terminated and may be referred to regulatory authorities or law enforcement.

Certification

Bing Enterprises, Inc. certifies that:

- We have fully implemented STIR/SHAKEN authentication
- We authenticate all outbound calls using our STI certificate through the Telonium authentication proxy
- We apply appropriate attestation levels, primarily B-level attestation, in accordance with ATIS and FCC standards
- We maintain an effective robocall mitigation program compliant with 47 CFR § 64.6305
- We originate calls only on behalf of authenticated and authorized customers
- We maintain traceback cooperation procedures and regulatory compliance controls
- We comply with FCC robocall mitigation and STIR/SHAKEN requirements

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Certified and Updated: February 19, 2026

Bing Enterprises, Inc.

DBA: Aloha Tone

Honolulu, Hawaii