

ANI Networks

Robocall Mitigation Plan

Affinity Network, Inc. d/b/a ANI Networks for itself and on behalf of its affiliates (hereinafter, the "Company") hereby submits this Illegal Robocall Mitigation Plan (the "Plan") to the Federal Communications Commission ("FCC") pursuant to the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act.

- (1). The Company is an active participant in the USTelecom Industry Traceback Group ("ITG") as an ITG Steering Committee Member. The Company fully participates with the ITG in order to: (1) provide for the robust protection of voice networks and users of such services from fraudulent, abusive, and/or unlawful robocalls; (2) work to reduce the number of illegal robocalls; (3) identify the source of such calls through Trace back and Trace Forward efforts; and (4) implement Do Not Originate (DNO) procedures when requested by governmental agencies through USTelecom. The Company is an ITG Cooperative Voice Service Provider as defined by the ITG Policies and Procedures and takes all necessary steps to ensure that it will not meet the definition of a Non-Cooperative Voice Service Provider.
- (2). The Company is an active member of the Traffic Pumping Trace Back Group ("TPTG") hosted by SOMOS. The TPTG investigates traffic to determine if the calls are illegal Toll-Free Traffic Pumping through Trace back efforts. The group includes Resp Orgs, carriers, law enforcement, and other agencies determined eliminate illegal Toll-Free Traffic Pumping.
- (3). 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.
- (4). The Company has implemented STIR/SHAKEN and has engaged an STI-Certificate Authority (STI-CA) service provider for Company. The STI-CA will interact with the STI-Policy Administrator (STI-PA) on Company's behalf to ensure that (1) only vetted and approved customers are authorized to sign calls and (2) such customers' calls are signed exclusively with certificates that have been issued by the national level.
- (5). The Company's experienced telecommunications personnel continually monitor our network to identify and mitigate any irregular traffic patterns to reduce fraudulent and/or illegal robocall traffic. When the Company identifies potentially fraudulent, abusive, suspicious, or robocalling traffic patterns; it acts swiftly to mitigate this activity. Mitigation includes, but is not limited to, (1) blocking or rejecting known fraudulent/abusive traffic or invalid calling numbers utilizing the appropriate Session Initiation Protocol (SIP) response codes, (2) blacklisting a known abusive number, (3) tracing the call traffic back to the originating party, (4) reporting instances of irregular traffic activity to our carrier customer, (5) requiring the customer to remediate and detail the cause of said irregular traffic, (6) taking action such as suspension or termination for violations.
- (6). The Company provides service to carrier customers and requires potential customers to complete a comprehensive Know Your Customer Profile which includes the customer's legal information, USF Filer and exemption information, industry and financial references, and other pertinent data for ANI to vet the customer to ensure they are legitimate provider, verify that the carrier is a registered Intermediate Provider, if applicable, and in good standing and certified to provide telecommunication services. This Know Your Customer Profile also allows Company vet any foreign provider so Company can to take

reasonable and effective steps to ensure that such foreign provider, from which Company would directly receive traffic, is not using Company to carry or process a high volume of illegal traffic onto the U.S. network.

- (7). To further ensure that our customers are legitimate providers, the Company requires customers to manually InterOp and test with us prior to on-boarding. The company does not automate this process so we can physically interact with carriers prior to allowing them to pass traffic on our network.
- (8). The Company utilizes the RealNumber Do Not Originate (DNO) to aid in fraud prevention on Toll-Free and 10-digit local numbers and the Reassigned Numbers Database (RND) to verify if a US geographic or Toll-Free telephone number has been permanently disconnected and the date of the most recent permanent disconnection of said number.

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