



ALLENS COMMUNICATIONS

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ALLENS Communications ROBOCALL MITIGATION PLAN

ALLENS Communications, d.b.a. Allen's TV Cable Service, Inc., ("ALLENS") is a broadband provider that offers interconnected VoIP services to its subscribers on a resold basis. ALLENS wholesale VoIP provider is E Street Communications ("E Street"), a provider of wholesale and retail VoIP and other communications services across the United States.

While ALLENS necessarily relies on the robocall mitigation policies, procedures, and safeguards instituted by E Street, ALLENS has also adopted this robocall mitigation plan to take its own measures to limit the potential for the origination of unlawful robocalls by its customers that would be carried and processed by E Street and other downstream providers.

Know-Your-Customer Policies

Subscriber Vetting: ALLENS vets the identity of its customers when approving an application and entering into a contract for telephone service. As part of this vetting process, ALLENS collects the customer's legal name and address, physical location, and contact information. ALLENS services are provided to fixed locations using its own network and services are typically installed on location by its personnel, so ALLENS knows the actual location of its customers. All of this information enables ALLENS to validate the identity of potential customers prior to provisioning of service. ALLENS will not provide service if a new customer's identification cannot be verified.

Service Terms: Customers that use ALLENS telephone service for any unlawful purposes, including unlawful robocalls, are subject to suspension or termination of service.

Use of Call Analytics to Identify and Block Unlawful Traffic

ALLENS necessarily relies on E Street's use of call analytics to identify and block unlawful robocall traffic. If ALLENS receives a report or alert from E Street of suspected unlawful robocall traffic originated by an ALLENS end user customer, ALLENS will investigate. To the extent a customer is found to have violated its terms of service, ALLENS will act commensurate with the severity of the customer's offense, including, but not limited to, providing the customer with a warning or terminating the customer's service.

Knowledge of Upstream Providers

ALLENS upstream provider, E Street, is registered in the FCC's Robocall Mitigation Database, RMD0001973.

Cooperation with the Traceback Group, Law Enforcement and Government Agencies

ALLENS is committed to responding fully and within 24 hours to all traceback requests made by the Industry Traceback Group ("ITG"), law enforcement authorities, and government agencies to investigate and address suspected unlawful robocalls originated by ALLENS customers and will cooperate with E Street on traceback requests.