

- I. **Overview:** The FCC requires that all providers certify in the Robocall Mitigation Database their status for compliance with STIR/SHAKEN. Those not yet fully compliant must implement and certify the implementation of a Robocall Mitigation Plan to ensure that this illegal traffic does not originate on their networks as they work within the industry to become fully compliant. The Commission requires voice service providers to develop a Robocall Mitigation Plan that:
- details the reasonable steps taken to avoid originating illegal robocalls
 - demonstrates a commitment to respond to traceback requests to cooperate with investigating and stopping illegal robocalls
 - is filed in the Robocall Mitigation Database. This mitigation plan is submitted on behalf of Apeiron Systems, Inc.

Apeiron Systems, Inc. (“Apeiron”) is a provider of telecommunications services using the SIP protocol. Being such a provider, Apeiron maintains a Robocall Mitigation Plan that is detailed in the following sections.

- II. **General Prohibition Against Illegal Robocalling:** Apeiron end user services are subject to restrictions contained in its published legal notices and all executed services orders include the requirement that service is provided pursuant to its terms of service (“TOS”) requirements. Its existing TOS prohibit activities normally associated with Robocalling including, but not limited to:
- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
 - violating any applicable local, state, or federal law; using the Apeiron service to engage in or in connection with fraudulent activities.

Apeiron’s end users are notified that Apeiron may act up to suspension or termination of service for violation of the TOS.

- III. **Know Your Customer:** Apeiron utilizes the mitigation technique of “Know Your Customer.” Apeiron requires all customers to document company information and operations contact information that demonstrate that each customer has been identified as the entity that has activated service with Apeiron. Customers cannot order voice products with Apeiron unless the KYC documentation has been put on file and reviewed by Apeiron personnel to confirm the details.
- Businesses requesting large volume calling capability must provide a tax ID and verification as to the nature of the business.
 - We verify physical addresses and IP addresses to look for overlapping / multiple deployed voice path subscriptions
 - An Apeiron representative may visit the premise of the business to verify the number of users at the location is appropriate for the volume of calling.

Further Apeiron will set a call path level based on its average customer size within each product type.

- IV. **Network Monitoring:** Apeiron is continuing development of custom software in-house that allows for real-time monitoring of traffic and will flag call patterns indicative of potential illegal robocalling. Additional capability is being added to the software which will automatically disable any subscribers associated with flagged call patterns.
- V. **Traceback and Enforcement Cooperation:** Apeiron will actively cooperate with the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG) to investigate and stop illegal robocalls. Apeiron will dedicate sufficient resources to provide prompt and complete responses to traceback requests.