



ARIS Robocall Mitigation Plan

1. **ARIS** is a Small Service Provider, serving fewer than 100,000 voice service subscriber lines and therefor qualifies for an extension until June 30, 2023 of STIR SHAKEN Implementation under 47 C.F.R. §64.6304(a), which reads:
§64.6304 Extension of implementation deadline.
 - (a) Small voice service providers. (1) Small voice service providers are exempt from the requirements of §64.6301 through June 30, 2023.
 - (2) For purposes of this paragraph (a), “small voice service provider” means a provider that has 100,000 or fewer voice service subscriber lines (counting the total of all business and residential fixed subscriber lines and mobile phones and aggregated over all the provider’s affiliates).
2. **ARIS** commits to respond to all trace back requests from the commission, law enforcement, and industry trace back consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.
3. **ARIS** has taken the following specific steps to detect originating robocall traffic:
 - a. Subscription to Ribbon Communications ID Hub Fraud and Call History Server
 - b. Automated alerts sent out when high volume is detected
4. Any anomalies in the tracking that indicate abnormal calling activity will be reported to the appropriate entity following the appropriate regulatory practice.