

AMCS LLC

ROBOCALL MITIGATION PLAN

AMCS LLC ("AMCS") offers Voice over Internet Protocol calling features to customers of certain collaboration and communications services of Amazon Web Services, Inc ("AWS"). [REDACTED]

AMCS's services are provided with the support of its carrier partners. While AMCS necessarily relies on the robocall mitigation policies, procedures, and safeguards instituted by its carrier partners, AMCS 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 its carrier partners and other downstream providers.

Know Your Customer Policies and Controls

Customer Validation: A customer's identity is validated before a customer enters into a service agreement with AMCS. As part of this process, the customer must provide their legal name and address, physical location, contact information, and, for most commercial customers, federal tax ID. In some instances third-party agencies are used to obtain additional information regarding the credit and/or fraud risk associated with a potential customer. If the customer's identity cannot be verified based on the initial information provided, the customer may be required to provide additional information. All of this information enables AMCS to ensure the identity of a potential customer has been validated prior to provisioning [REDACTED]

[REDACTED] AMCS will not provide service to a customer if their identity cannot be verified.

[REDACTED]

Contractual Obligations: AMCS has instituted contractual terms with its customers, including any upstream providers, that prohibit the use of its services for (i) any unlawful purpose, including, but not limited to, violations of laws specifically regulating unsolicited or unwanted communications and telemarketing, and (ii) engaging in unusual calling patterns inconsistent with typical individual use. [REDACTED]

[REDACTED]

To the extent a customer is found to have violated its contractual obligations for the reasons noted previously or any other reason, AMCS will take action commensurate with the severity of the customer's offense, including, but not limited to, providing the customer with a warning or suspending the customer's service without notice.

Customer Education: AMCS is also committed to providing its customers with education regarding responsible outbound calling and provides said customers with guidelines to ensure they are engaging in outbound calling in a responsible and legally compliant manner.¹

Use of Call Analytics to Identify and Block Unlawful Traffic

AMCS relies on both its own analytics as well as its downstream carrier partners' use of call analytics systems to identify and block unlawful robocall traffic as set forth in their robocall mitigation plans on file with the FCC.

AMCS uses different methods to track trends that identify potential misuse of its services. These include [REDACTED]

AMCS's carrier partners have reported that the call analytics they employ for AMCS's traffic can also detect call patterns that indicate robocall activity, including, but not necessarily limited to, an unusually large number of calls from the same number, an excessive number of short duration calls, and calls that stop attempting to connect after a single ring, as well as calling numbers that are invalid, unallocated, or on the Industry Traceback Group's ("ITG") Do Not Originate ("DNO") list. If AMCS receives a report or alert from any downstream carrier partner of suspected unlawful robocall traffic originated by a AMCS end user customer, AMCS will conduct an investigation. To the extent a customer is found to have violated its contractual agreement with AMCS, AMCS will take action 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 without notice.

Cooperation with the Industry Traceback Group, Law Enforcement and Government Agencies

AMCS is committed to responding fully and within 24 hours to all traceback requests made by ITG, law enforcement authorities, and government agencies to investigate and address suspected unlawful robocalls originated by AMCS's end user customers.

AMCS is also committed to cooperate with its carrier partners on traceback requests and to fully comply with the Commission's robocall blocking requirements. AMCS understands that AMCS

¹ [REDACTED]

and its carrier partners will block all calls and provider traffic that: (1) are identified in any public notice or order released by the FCC; (2) are substantially similar to the types of traffic identified in any public notice or order released by the Commission; (3) are transmitted by a voice service provider that does not appear in the FCC's robocall mitigation database; or (4) include a caller ID number or name that is on DNO list issued by ITG.