

**ACN Communication Services, LLC
d/b/a Flash Mobile
d/b/a Flash Wireless**

Robocall Mitigation Plan

Updated: September 2025

Introduction

ACN Communication Services, LLC (“ACN” or “Company”) provides voice services to both residential and business customers through three service models: (1) traditional wireline TDM voice resale (no longer offered to new customers); (2) interconnected VoIP resale (no longer offered to new customers); and (3) mobile wireless service resale. It operates under the d/b/a’s Flash Wireless (used for some legacy wireless customers) and Flash Mobile for its wireless services. In all cases, the Company operates as a pure reseller and lacks control of any network infrastructure, including switching facilities, necessary to implement STIR/SHAKEN. The Company does not obtain its own telephone numbers from NANPA under any of its service models.

The Company is exempt from a STIR/SHAKEN implementation obligation because it lacks control over the network infrastructure necessary to implement STIR/SHAKEN. *See First Caller ID Authentication Report and Order*, 35 FCC Rcd at 3241, para. 40; 47 CFR Section 64.6304(b).

The Company has confirmed that its underlying providers, where applicable, have implemented STIR SHAKEN in the IP portions of their networks and are authenticating calls originating from ACN customers in accordance with the STIR/SHAKEN authentication framework.

In the non-IP portions of their networks, ACN’s underlying carriers and ACN rely on robocall mitigation programs.

Robocall Mitigation

Know Your Customer:

ACN establishes new wireless customer accounts based on customer information provided at order entry. Address validation and credit card validation are used to ensure that all accounts are provisioned based on a real person with a valid US address. The Company’s wireless customers have no means of modifying their telephone number or caller ID to be inconsistent with the name and number provisioned upon initial set up.

The Company no longer processes any new service orders, moves or changes for its traditional TDM customers or for interconnected VoIP customers, who are all “grandfathered” under their current calling plans. Accordingly, customers using these services are unable to change their telephone numbers and traditional wireline TDM customers cannot change their service address.

International Call Originators:

The Company does not sell services to international call originators and does not operate as a foreign carrier.

Call Analytics

ACN does not utilize any third-party entities for call analytics.

Other Robocall Mitigation Practices

ACN has implemented Neustar's "Trusted Caller Service" to verify inbound calls. The service provides CNAME validation and modification on calls identified in the database as SPAM, Robocall or Unverified. The CNAME query to Neustar will return either a validated CNAME or modified CNAME value identifying the call as SPAM or Unverified accordingly. This Caller ID value is delivered to the ACN end user allowing them to screen unwanted calls.

The Company maintains and requires customers to agree to an Acceptable Use Policy ("AUP") that prohibits the use of its services for illegal and/or fraudulent uses. Under the terms of the AUP, the Company can and will suspend and/or terminate a customer's service if it violates these terms of use.

Call Blocking:

As a reseller, the Company does not have the ability to block calls but relies on its underlying carriers to block calls from companies not registered in the RMD or for other violations of the Commission's robocalling rules.

Responding to Traceback requests:

ACN is committed and will respond fully within 24 hours to all traceback requests from the FCC, law enforcement agencies, and the Industry Traceback Consortium and will cooperate with these agencies to investigate and stop any illegal robocallers that use its service to originate calls. ACN devotes sufficient resources to provide prompt and complete information to traceback requests.

The Company's point of contact to handle traceback requests is:

Name	Title	Contact Info
Shane Gingell	Chief Information Officer	704-260-3446

Upon receiving a request, the Company will provide details regarding the customer's call to enable investigation of the suspected robocalling. If the Company does not have direct access to the call history, it will contact the underlying carrier/partner and request that the call history be provided within twenty-four (24) hours.

ACN Contact for Robocall Mitigation-Related Issues:

The Company will update our Robocall Mitigation filings within 10 business days of any changes to the information outlined in this plan. Please direct any questions related to Robocall Mitigation issues to:

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