

ALLBAND COMMUNICATIONS COOPERATIVE ROBOCALL MITIGATION PROGRAM

The Allband Communications Cooperative (Allband) network is Complete IP. Allband originates all calls via SIP connections to other carriers. Allband has registered with the Policy Administrator and is an authorized service provider in the STIR|SHAKEN ecosystem. Allband has implemented STIR|SHAKEN within the IP portions of its network and signs the calls originating on the IP portions of its network with the Allband certificate.

Robocall Mitigation Program

All voice traffic that originates on Allband's network is subject to the following Robocall Mitigation Program.

Call Analytics - Internal Traffic Monitoring & Analytics

Allband does not contract with a vendor to provide call analytics on its originating calls. Allband internally monitors all originating network traffic for suspicious or abnormal call pattern, volume or activity. Calls that meet the below qualifying factors are investigated internally to determine if the calls are legitimate or unlawful:

- High-volume voice network traffic
- Large bursts of calls in a short timeframe
- Short duration calls
- Low average call duration
- Low call completion ratios
- Sequential dialing patterns
- Neighbor spoofing patterns
- Patterns that indicate contract violations
- Purported illegal robocall numbers on lists from regulators, consumers, and other carriers
- Comparison of dialed numbers to the National/State Do Not Call Registry

Do Not Originate Procedures

Allband blocks the origination of calls from unassigned telephone numbers out of its assigned NPA-NXX inventory and calls originating from numbers that are not valid NANP numbers. Examples of such invalid numbers include those that use an unassigned area code; that use an abbreviated dialing code, such as 911, 411, in place of an area code; that do not contain the requisite number of digits; and that are a single digit repeated, such as 000-000-0000.

Allband also blocks the origination of calls from telephone numbers on its internal Do Not Originate (DNO) list.

Investigation

Allband investigates calls identified internally as suspicious calls or those that have abnormal call volumes, patterns, or activity consistent with illegal robocalls.

In addition, if Allband has any other reason to suspect illegal robocalling or spoofing is taking place over its network, Allband will work internally to identify the party that is using its network to originate, route, or terminate such calls and take appropriate action.

Enforcement

Illegal robocalls and fraudulent spoofing is prohibited on the Allband network. If it is determined that an Allband customer is using its network to fraudulently spoof calls or to originate illegal robocalls, Allband will either warn the customer to stop such practices or terminate their service as allowed per Allband policy.

Know Your Customer (KYC)

Allband has procedures in place to prevent new & renewing customers from using its network to originate illegal robocalls. Allband thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services.

Residential customers are asked to provide their full name, address (physical and mailing, if different), phone number, email, and establish a security question, and a password.

Business customers are asked to provide their full name, address (physical and mailing, if different), tax identification number, phone number and email.

To initiate an account change, a customer must provide their password or the answer to their security question prior to initiating a change. If the customer is unable to provide that information the customer service representative will call the customer back using the number they provided during account setup.

Upstream Provider Knowledge

Allband knows all the carriers from which it receives traffic and has confirmed that all of the carriers are listed in the Robocall Mitigation Database. Allband monitors incoming traffic from all connected carriers for suspicious call patterns indicative of illegal robocall activity, notifies the upstream carriers of any such traffic and warns the carriers that if the traffic does not cease, the calls may be blocked from entering Allband's network. In addition, Allband is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.

Traceback

Allband commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers who Allband learns are using its service to originate calls. Allband commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within twenty-four (24) hours.