

Accipiter Communication Inc. Robocall Mitigation Plan

This Robocall Mitigation Plan describes the specific reasonable steps that Accipiter Communication Inc. (“Accipiter”) has taken to avoid the origination, carrying, or processing of illegal robocall traffic on its network.

Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Robocalls

Accipiter has a “know-your-customer” policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. Specifically, for new and renewing business customers, Accipiter collects information such as the customer’s physical business location, contact person(s), state or country of incorporation, federal tax ID, and the general nature of their business.

Although Accipiter’s customers generally do not generate a high volume of calls, were Accipiter to receive a request for high-volume origination services, it would exercise caution and extensively investigate such customers before granting access to the services.

Accipiter has provisions in its acceptable use policies that allow for service suspension and/or termination in the event its voice services are used for illegal purposes such as illegal robocalling.

“Know-Your-Upstream Provider” Procedures

Most of the connections that Accipiter has with upstream providers have been in place for many years, and we know these companies very well. However, Accipiter exercises due diligence before accepting traffic from any new upstream provider as we seek to ensure that such providers are not using Accipiter to carry or process a high volume of illegal traffic. Specifically, Accipiter collects information such as the upstream provider’s physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of their business.

Use of Call Analytics Systems

Using internal call records from its Class 5 Metaswitch database, Accipiter monitors call origination volume on customer lines and takes follow-up steps if a threshold volume is exceeded. If a customer is originating an unusually high number of calls per day on average on a single line, it will trigger an investigation into the reason for the call volume. When thresholds are exceeded, Accipiter will contact the customer to investigate. Illegal robocall campaigns and fraudulent calls will result in suspension and/or termination of service.

Accipiter also uses analytics software provided by TransNexus to monitor all outbound voice traffic on its IP voice traffic in real-time to prevent the origination or transit of illegal robocalls.

The software provides detailed reporting to identify suspected illegal robocalls. The system alerts us if we process outbound calls where the calling number has a poor reputation or is invalid, unallocated, or on a Do Not Originate list.

We perform the same mitigation steps for all outbound calls regardless of our role in the call chain for a particular call.

We will investigate any identified suspicious calls to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls. If we determine that the traffic was likely unlawful, then we warn them to stop sending such traffic. If they continue to send traffic that appears to be unlawful, then we terminate their service.

(From Transnexus template)

STIR/SHAKEN

We have registered with the STI-PA using OCN 2191. We have our own STIR/SHAKEN certificate issued by the TransNexus Certification Authority (STI-CA) that we use when authenticating calls we originate. We have implemented a STIR/SHAKEN solution supplied by TransNexus.

We are exempt from STIR/SHAKEN implementation requirements for some calls because these calls rely on non-IP technology - 47 CFR 64.6304(d).

Commitment to Respond to Traceback Requests

Accipiter commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its services to originate, carry, or process illegal robocalls.