

ICON Technologies, Inc.

Robocall Mitigation Plan

Background

ICON Technologies Inc is a small broadband ISP and VOIP carrier serving Lackawanna and Wayne County in Pennsylvania. Our customer base consists of small businesses and residents in Northeastern Pennsylvania. The majority of our customers have one or two lines. Only one customer has more than 20 lines.

Know Your Customer

Over 55% of our voice customers purchase VOIP service bundled with a fixed location broadband service. Therefore, we know these customers and their businesses. Many customers are single line customers provisioned with an analog adapter (ATA). These customers have very limited potential to generate robocalls. The remaining customers subscribe to our cloud PBX product. This product only works with endpoints (physical phones) that we provide. Again, the potential for robocalling is limited. Although we currently have no customers that generate legitimate robocall traffic (such as a school district announcing school closures), we would work with such customers to ensure their traffic is properly routed.

Of the customers who purchase VOIP without Internet service, 100% purchase our hosted PBX product. Again, the endpoints are provided as part of the service and the end user has no direct way to place an automated call. Finally, we do not offer SIP trunking or similar unbundled, “over the top”, service except as part of the hosted PBX product.

Any customer making Robocalls may have their service terminated under the terms and conditions of our standard customer agreement.

Traceback

ICON Technologies responds to all traceback requests from the Commission, law enforcement and the registered traceback consortium and cooperates with such entities in investigating and stopping any illegal robocallers that use our service to originate calls.

Robocall Mitigation Program

ICON Technologies has implemented a Robocall Mitigation Program for all originating calls made from our Network. All VOIP services are assigned to specific DID groups on our switch, and outbound traffic volume is monitored per group to identify unusual calling patterns. Customer calls are automatically assigned correct calling numbers. Customers do not have the ability to override their outbound/calling number. We will immediately investigate any potential robocall or suspicious call, and if warranted, we will notify the customer to stop originating unlawful calls or terminate their service if warranted.

Knowledge of Upstream Providers

All ICON VOIP calls are carried by one of two upstream providers – VOIP Innovations, and Bandwidth.com. Both are a well-known, reputable wholesale service providers that are registered in the FCC’s Robocall Mitigation Database. Both upstream providers connect to multiple Tier-1 service providers, all of whom are similarly registered in the RMD and have

represented to the FCC that they have policies and procedures to identify and block unlawful robocall traffic.