



Robocall Mitigation Plan

ALL IT LLC is a voice service provider that originates traffic to the public switched telephone network (PSTN) and has implemented STIR/SHAKEN caller ID authentication in accordance with 47 CFR § 64.6301(a). Our STIR/SHAKEN deployment includes use of a valid Service Provider Code (SPC) token, a certificate from an approved Certificate Authority, and an operational authentication infrastructure.

All IP-based calls that we originate and that will ultimately terminate on the PSTN are signed using STIR/SHAKEN. Our implementation ensures compliance with FCC requirements and helps protect consumers from caller ID spoofing and robocalls.

All IT, LLC, nor any of our executives or principals have a history of enforcement actions for illegal robocalls, TCPA or TSR violations or related state law violations. We have not been prohibited from filing a certification in the Robocall Mitigation Database.

STIR/SHAKEN Implementation Details:

Authentication Framework:

- All applicable IP-based outbound calls are signed with STIR/SHAKEN tokens using our certificate.
- Our authentication service is deployed and maintained in a secure production environment.

Certificate Authority Enrollment:

- We are actively enrolled with an approved STIR/SHAKEN Certificate Authority (CA), and our token and certificate are valid and current.

SPC Token Details:

- Our SPC token was issued by the STI-PA following the approval process, including completion of FRN, 499 ID, and relevant filings.

Call Signing Policy:

- We apply appropriate attestation levels (A, B, or C) to all calls based on the level of knowledge and relationship with the end user.
- Attestation policies follow the ATIS-1000074 standard.

In addition to our complete STIR/SHAKEN implementation we use the affirmative and effective measures detailed below to prevent the origination or transit of illegal robocalls.

Know Your Customer

We follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

Industry Participation

We respond within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls.

Robocall Mitigation Program

We rely on software provided by Bandwidth and Commio to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls.

Combining behavioral analytics, caller authentication and verification, our solution features:

- **Fraud Detection:** Detection of high volume robocalling, spoofing and spam call activity.
- **Subscriber Notification:** Caller ID Name override to warn subscribers of suspicious calls.
- **Call Blocking Support:** Accurate identification enabling you to block fraudulent phone calls as per the TRACED Act (2019)
- **Business Number Verification:** Register legitimate business numbers to prevent unintentional call blocking.
- **Caller ID Name Service:** Easy integration of Caller ID name lookup service, including robocall mitigation with override to include original caller ID even when call is determined fraudulent.
- **Do Not Call Registry:** We comply with the FTC's rules for the Do Not Call Registry.

We have also implemented a Call Abuse Policy, as it pertains to the TRACED Act, and have published the following policy to our web site, terms of use, and have notified our customers of the policy as copied below:

"Any call originated on All IT, LLC network is subject to inspection and investigation if the call is suspected of being fraudulent, abusive, or illegal. Calls meeting any of these criteria will be blocked. If these conditions are repeated, becoming excessive, the subscriber may be removed from All IT, LLC's network, may be subject to further investigation by the FCC for enforcement of the TRACED Act and the subscriber may be subject to fines and penalties imposed by the FCC or the jurisdictional court"

