



Robocall Mitigation Plan

Aline Phone Systems
3139 Republic Blvd N
Toledo, OH 43615
FRN: 0029006558

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>)

Traceback

We respond 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.

STIR/SHAKEN Extensions

We are a reseller of voice services hosted on VoIP platforms by VoIP Innovations and have implemented STIR/SHAKEN protocols.

Robocall Mitigation Program

We rely on software provided by VoIP Innovations 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.

In addition, we have implemented a Call Abuse Policy 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 the Aline Phones Systems 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 disconnected from

Aline Phones Systems 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.”

Additional Information:

- 1) Role(s) of Call Chain:
 - a. Archie Heint, President and CEO
 - b. Dane Vollmar, CTO
 - c. Jay Burkett, Process Technology Director
 - d. Zak Shambaugh, Aline Tech Support Specialist
- 2) Aline Phone Systems has taken the necessary steps according to ATIS standards in their network to and signs calls with an A attestation. Unless otherwise certified by Aline Phone Systems, all customer third party numbers are signed with a B attestation.
- 3) Parent Company
 - a. Double A Solutions
3139 Republic Blvd N
Toledo, OH 43615
 - b. Archie Heint – CEO and Owner
- 4) Aline Phone Systems is not subject to a Commission, law enforcement or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- 5) OCN: 644K