

ANTEIL INC
ROBOCALL MITIGATION PLAN

Anteil Inc is a reseller of VoIP services, exclusively to end users, as a secondary offering in conjunction with other primary technical services. Anteil has less than 25 VoIP customers and fewer than 1,500 voice subscriber lines. Anteil relies exclusively on up-stream voice service providers for call authentication, origination and termination. All of our voice service providers have implemented STIR SHAKEN as of January 1, 2023.

Robocall Mitigation Plan

All VoIP traffic that originates on Anteil's network is subject to the following Robocall Mitigation Plan.

I. STIR-SHAKEN IMPLEMENTATION STATUS

As indicated in the FCC's Robocall Mitigation Database, the Provider's status with respect to STIR-SHAKEN implementation is as follows:

The Provider has not implemented the STIR/SHAKEN authentication framework on any portion of its network and all calls originating on its network are subject to the policies and procedures set forth in this Robocall Mitigation Plan which are intended to stop anyone from using the Provider's service to originate illegal robocalls.

Presently, Anteil relies exclusively on our up-stream voice service providers for call authentication, origination, and termination. At this time no part of the Provider's existing network is capable of initiating, maintaining, carrying, processing, or terminating interconnected VoIP calls, with a continued transmission of STIR-SHAKEN attestation data.

Anteil has not been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling. Anteil has not been prohibited from filing in the Robocall Mitigation Database (RMD).

II. TRACEBACK REQUESTS

Anteil commits to cooperation with the FCC, law enforcement and the (ITG) on all traceback requests and investigations. To allow for timely and comprehensive law enforcement response efforts against illegal robocallers, Anteil will dedicate sufficient resources to promptly complete and provide responses to all traceback requests received from the FCC, law enforcement and/or the ITG, and commits to fully responding to any traceback request received within 24 hours after receiving the same. Anteil identifies a single point of contact for receiving all traceback requests in Appendix A.

As part of its efforts to assist in the successful traceback of illegal robocalls, all of Anteil's up-stream VoIP providers, listed in Appendix A, currently provide and will continue to provide traceback cooperation on any voice service calls exchanged.

III. CUSTOMER VETTING PRACTICES

Anteil does not market, resell, or otherwise provide VoIP services to the general public. Anteil resells VoIP services exclusively to well known existing customers, in conjunction with software development, hosting, or other system integration services.

III. UPSTREAM PROVIDERS

As a means of preventing or minimizing the origination of illegal robocalls through its voice services, Anteil contracts exclusively with up-stream providers that adhere to STIR SHAKEN protocols. A list is provided in Appendix A.

V. INTERNATIONAL CALLING

Anteil does not provide its customers with origination or termination for international calls.

VI. ONGOING ROBOCALL MITIGATION PRACTICES

Anteil monitors the usage of its network and examines call detail records (CDRs) on a regular basis for irregular calling activity.

Anteil requires all point-to-point VPN installed at each of its customers' sites, in order to prevent unauthorized use of its network and VoIP resources.

Anteil maintains access to customers' PBX systems to enable monitoring and traceback of any suspicious calls or calling patterns. This also provides a mechanism for direct monitoring and validation of caller ID numbers used for call origination.

Anteil and its up-stream providers monitor call activity specifically for large bursts in traffic, origination of calls of short duration, and low call completion percentages.

Appendix A

Traceback Request Single Point of Contact:

Name: James A. Capp
Title: President & CEO
Phone Number: (717) 645-0447
Email Address: jcapp@anteil.com

Upstream Providers

Name: Bandwidth.com
Location: Raleigh NC
Phone Number: (800) 808-5150

Name: VoIP Innovations
Sangoma Wholesale Carrier Services
Location: Huntsville AL
Phone Number: (256) 428-6000