

Robocall Mitigation Plan

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Introduction

This Robocall Mitigation Plan is submitted by WAN Communications, Inc. pursuant to the provisions of 47 C.F.R. § 64.6305, adopted by the Federal Communications Commission (FCC) which require all “voice service providers” to establish a “robocall mitigation plan”. This document sets forth the WAN Communications, Inc. current policies and procedures designed to minimize or eliminate the possibility of outbound illegal robocalls originating on its network. WAN Communications views these policies and procedures as constituting “reasonable steps” to avoid the origination of illegal robocalls on its network. In addition to following these steps, Acclaim Telecom commits to responding to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG), and to cooperate with such entities in investigating and stopping any illegal robot callers that may use its service to originate calls.

Stir/Shaken Implementation Status

As of the last Revision above, WAN Communications has implemented the STIR/SHAKEN authentication framework on 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 WAN Communications voice services to originate illegal robocalls.

- WAN Communications has been filing FCC 499-A
- WN Communications has obtained an OCN (425L)
- WAN Communications has filed a Robocall Mitigation Plan with the FCC (including this revision)
- WAN Communications has Registered with the STI Policy Administrator and obtained an SPC Token
- WAN Communications has obtained a STIR/SHAKEN certificate from a valid STI-CA
- WAN Communications has not implemented the STIR/SHAKEN authentication frame work on any portion of its network and all calls originating on its network are subject to the policies and procedure set forth in this Robocall Mitigation Plan which are intended to stop anyone from using the provider's service to originate illegal robocalls.
- WAN Communications is not an intermediary service provider and will not have traffic from other vendors as a passthrough service. However, illegal attempts to pass calls through WAN Communications network are blocked by authentication requirements.

Additional steps taken by Wan Communications Services.

- WAN Communications fully vets all customers that will be using any outbound services. This includes ensuring the phone number being used is not listed as a SPAM number and belongs to the customer requesting the service

- All potential outbound numbers are listed in a database and any attempt to place an outbound call campaign with any number not in the database (or blacklisted) will be denied
- WAN Communications prohibits outbound marketing campaigns for all customers and will discontinue services if such campaigns are discovered, even if the originating number is not flagged as SPAM
- Wan Communications will promptly disable customers from placing outbound robocalls that are in violation of the policies set forth
- WAN Communications does not provide political messaging, polling, or any calls to the general public that have not been vetted as business use only. TR

Traceback Requests

The provider will Cooperate 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, the provider will dedicate sufficient resources to promptly complete and provide responses to all traceback requests received from FCC, law enforcement and or ITG, and commits to fully responding to any traceback request received within 24 hours after receiving the same.

As part of efforts to assist in the successful traceback of illegal robocalls, the provider will going forward include within its carrier interconnection and/or service agreement requiring traceback cooperation on any voice service calls exchange.

Customer Vetting Practices

As a means of preventing or minimizing the origination of illegal robocalls through its outbound voice services, Wan Communications will use best practices in vetting the identity of all of its voice service subscribers. The subscriber vetting process is intended to help determine the legitimacy of a customer for the purpose of establishing a service relationship. Generally, WAN Communications looks to confirm the identify of customers using its outbound voice services through collecting information such as physical customer location, contact person(s), state of incorporation, federal tax ID, and the nature of the customer's business. Wan Communications will size any potential customer request(s) before provisioning any services for use. This includes number of phone numbers, potential uses, service agreements and rights to use telephony services requested. WAN Communications will also add robocall mitigation language to any agreements in which the potential customer seeks the use of outbound calling campaigns.

Telephone Number Validation

With respect to meeting existing obligations and to take affirmative, effective measures to prevent customers from originating illegal calls, Wan Communications has implemented the following practices.

- WAN Communications business model is to provide outbound notifications for business entities only
- WAN Communications onboards potential customers that have a legitimate business reason for using an outbound call service provider
- WAN Communications does not have residential subscribers
- No marketing, advertising, polling, religious, or political messages are allowe

Call Analytics

WAN Communications maintains call details for all outbound campaign calls for a minimum period of four years. These details include but are not limited to the following.

- Call volume
- Call duration
- Start time and End time of campaign
- Origination phone number sorted by subscriber
- Content of the delivery message for further review (in written text)
- All call destinations
- No call queuing

History of Enforcement Actions

As of the date of this Revision, WAN Communications has not performed any Enforcement actions. There have not been any observed or reported violations to require it. If any actions are required in the future, Wan Communications will update this document and detail the steps taken.

International Call Origination

Wan Communications is not currently an international voice services provider. If at any time WAN Communications does decide to sell services to customers which are international call originators using North American Numbering Plan resources, Wan Communications will familiarize itself with and develop best practices for vetting such customers and performing telephone number validation on all international originated calls.

Know Your Upstream Provider Procedures

Wan Communications has a longstanding relationship with its upstream provider and maintains awareness of the nature of their businesses and the legitimacy of their call transmission services. Wan Communications has chosen an upstream provider with a proven track record of robocall mitigation and monitoring. Further, Wan Communications, in the interest of providing the highest quality services to all of its voice service customers, is committed to taking those steps necessary to ensure that Wan Communications upstream provider is equally committed to eliminate illegal robocalls. This includes the use of robocall prevention language in any contracts that Acclaim Telecom may directly have with its upstream provider.

WAN Communication may establish a relationship with additional upstream provider(s) in the future at which time all articles contained in this RMD will be fully implemented in the new relationship.

Traceback Request Single Point of Contact

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