

AAA SECURITY COMMUNICATIONS INC.

ROBOCALL MITIGATION PLAN

AAA Security Communications, Inc. (“AAA”) is a service provider that offers interconnected VoIP services to its subscribers on a resold basis. AAA’s wholesale VoIP providers are Momentum Telecom, Inc. (“Momentum”) and Veracity Networks, LLC (“Veracity”), each of which is registered in the Robocall Mitigation Database.

While AAA necessarily relies on the robocall mitigation policies, procedures, and safeguards instituted by the wholesale providers, AAA has also adopted this robocall mitigation plan to take its own measures to limit the potential for the origination of unlawful robocalls by its customers that would be carried and processed by the wholesale providers and other downstream providers.

Know-Your-Customer Policies

Subscriber Vetting: AAA vets the identity of its customers when approving an application and entering into an agreement to provide telephone service. As part of this vetting process, AAA visits each location where service will be provided and collects the customer’s legal name and address and other contact information. AAA’s services are provided to fixed locations and services are installed on location by its personnel, so AAA knows the actual location of its customers. This information enables AAA to validate the identity of potential customers prior to provisioning of service. Service will not be provided if a new customer’s identification cannot be verified.

Contractual Terms: AAA’s terms of service prohibit the use of its telephone service for fraudulent or unlawful acts or purposes and prohibits customers from falsifying calling party identification information. AAA may terminate a customer’s service for violations of its terms.

Use of Call Analytics to Identify and Block Unlawful Traffic

AAA relies on its wholesale providers’ use of call analytics systems to identify and block unlawful robocall traffic as set forth in their robocall mitigation plans on file with the FCC.

Momentum reports that its call analytics can detect call patterns that indicate robocall activity, including, but not necessarily limited to, an unusual large number of calls from the same number, an excessive number of short duration calls, and calls that stop attempting to connect after a single ring, and calling numbers that are invalid, unallocated, or on the Industry Traceback Group’s Do Not Originate (“DNO”) list.

Veracity reports that its core telecommunications system is comprised of Ribbon Sonus Gateways with centralized routing management utilizing Ribbon PSX platform that is linked to the Ribbon ID Hub service, which screens all outbound call requests to identify nuisance level scoring of each call, allowing Veracity to identify and block calls that are highly likely to be unlawful. Veracity also reports it uses TransNexus fraud detection platform as a secondary customizable fraud detection layer.

If AAA receives a report or alert from any of its wholesale providers of suspected unlawful robocall traffic originated by an AAA end user customer, AAA will conduct an investigation. To the extent a customer is found to have violated terms, AAA will take action commensurate with the severity of the customer's offense, including, but not limited to, providing the customer with a warning or terminating the customer's service without notice.

Knowledge of Upstream Providers

AAA's upstream providers are well-known, reputable wholesale service providers that are registered in the FCC's Robocall Mitigation Database. AAA does not itself have knowledge or insight into the upstream providers from which its wholesale providers receive traffic, but understands from their mitigation plans that their direct upstream connections are with service providers that similarly have represented to the FCC that they have policies and procedures to identify and block unlawful robocall traffic.

Cooperation with the Traceback Group, Law Enforcement and Government Agencies

AAA is committed to responding fully and within 24 hours to all traceback requests made by the Industry Traceback Group ("ITG"), law enforcement authorities, and government agencies to investigate and address suspected unlawful robocalls originated by AAA customers.

AAA is also committed to cooperating with its wholesale providers on traceback requests and to fully complying with the Commission's robocall blocking requirements. AAA understands that its wholesale providers will block all calls and provider traffic that: (1) are identified in any public notice or order released by the FCC; (2) are substantially similar to the types of traffic identified in any public notice or order released by the Commission; or (3) include a caller ID number or name that is on DNO list issued by ITG.