

Robocall Mitigation Plan

I. Business Information

Name of Business: AffecTel LLC (“AffecTel” or “The Phone Guy”)

Address of Business: 706 Judith Dr, Johnson City, TN 37604

Description: Retail services to business customers (no residential)

II. Contact Information

Contact Person: Michael F Balluff

Title: Member

Address: 706 Judith Dr, Johnson City, TN 37604

Telephone Number: 423-557-6800

Email Address: mballuff@affectel.com

III. Know Your Customer

- A. Goal is to identify initially Customers that may engage in the use of Robocalls. A “Robocall” means an illegal call using an auto-dialer with a random or sequential telephone number generator that delivers an initial prerecorded message or artificial voice that is placed either (i) for telemarketing purposes without the called party’s prior written consent, or (ii) to a wireless number for any purpose without prior express consent.
- B. Customer Screening: From each Customer we require the following information which we maintain electronically in Company records gathered on a Company form:
- ☐ Physical location/address.
 - Contact person.
 - Place of incorporation (state or country).
 - Federal tax ID number.
 - Type of Customer’s account
(i.e., enterprise, call-center, small business)
 - ☐ Nature of Customer’s business.
 - Size of Customer’s business.
 - Are auto-dialers used for any purpose?
 - Call-Centers Customers must:

- ☐ provide details about planned use of Company's services that clarify/confirm robocalls are not in use.
- ☐ Provide written certification that they are not placing Robocalls.
- Foreign Customers must also:
 - ☐ State if they are using NANP numbers.
 - ☐ Provide the purpose of use of NANP numbers
 - ☐ Provide written certification that they are not placing Robocalls.
- C. We update Customer Information at regular intervals to keep current on any changes of customer status.
- D. The Company's service agreements and contracts require Customers to comply with the Company's Acceptable Use Policy which prohibits Robocalls and allows Company to report suspicious activity when identified.

IV. Methods for Preventing Robocalls.

A. Assign Monitoring Levels.

- Assess information obtained pursuant to Sec. III.
- Verify all business entities and their proclaimed business purpose.
- Assign levels (Low to High) of monitoring based on information from Customer related to potential Robocall activity:
 - ☐ Low = Customer information suggests it is not likely a potential Robocall generator
 - ☐ Medium = Any U.S. based Customer whose info indicates it might be a potential Robocall generator
 - ☐ High = All Foreign Customers and any Customer where call monitoring has indicated potential Robocalling – High level status Customers must also provide written certification they are not generating Robocalls.

B. Customer Monitoring.

- ☐ Initial and monthly monitoring of all customers to validate Monitoring Level status.
- ☐ Validate ANI/CallerID against known Customer telephone numbers
- ☐ Validate Monthly total ALOC > 45 secs
- ☐ Customers that do not pass the above tests are then assigned the High monitoring status, which results in further Traffic Analytic reports that review possible Robocall indicators:
 - ☐ Check for ASR < 50 (very low call completion rates)

- ☐ Check for SD > 10% call behavior
 - ☐ Check for current monthly call volume > 25% increase over prior month.
- ☐ When the Traffic Analytic reports indicate potential Robocalling appropriate responses will be taken, which include some or all of the following:
 - ☐ source traceback investigations;
 - ☐ Customer contacts about suspicious activity; ☐ suspensions of Customers;
 - ☐ contact with relevant enforcement agencies.

C. Customer Contract Terms

- Advise Customers that they might be subject to random monitoring.
- All Customers must agree to cooperate in Traceback requests.
- When required, Customers must agree to provide certifications that they do not place Robocalls.

D. Customer Relations.

- Provide ANI/CallerID and Blocking capabilities allowing Customer block calls from individual numbers or at the network levels.
- Provide education and outreach to Customers about Robocall avoidance.
- Ensure there are no line item charges for Robocall mitigation on Customer bills.

V. Certifications

- A. Company has implemented the STIR/SHAKEN authentication framework in its internet Protocol networks pursuant to 47 C.F.R. § 64.6301.
- B. The traffic originated by the Customers of the Company is subject to the Robocall Mitigation Program contained herein.
- C. The Company is committed to respond to traceback requests and to cooperate with investigating authorities in their efforts to stop illegal Robocalls.

I, Michael F Balluff, have personal knowledge of the Company certifications contained herein and state, under penalty of perjury, that they are true and correct.

Dated this 12th of December 2024 in Johnson City, Tennessee.



Michael F Balluff

AffecTel, LLC.