

Innovative Financial Technologies, LLC d/b/a AW Broadband

ROBOCALL MITIGATION PLAN

Innovative Financial Technologies, LLC d/b/a AW Broadband (“AW Broadband”) offers interconnected VoIP services to its subscribers on a resold basis. AW Broadband’s underlying voice service provider is Telnyx LLC (“Telnyx”), which is registered in the Robocall Mitigation Database and performs first-party STIR/SHAKEN authentication on calls originated by AW Broadband’s end-user customers.

While AW Broadband necessarily relies on Telnyx’s robocall mitigation policies, procedures, and safeguards, AW Broadband 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 Telnyx or other downstream providers.

Know-Your-Customer Policies

Subscriber Vetting: AW Broadband 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, new and renewing customers provide their name, business location, state of incorporation, federal tax ID, and other contact information. This information enables AW Broadband 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: AW Broadband’s terms of service prohibit the use of its voice service for fraudulent or unlawful acts or purposes, including, but not limited to, origination of unlawful robocalls on its network. To the extent a customer is found to have violated AW Broadband’s terms of service, AW Broadband will take action commensurate with the severity of the customer’s offense, including, but not limited to, warning, suspending, or terminating the customer’s service.

Use of Call Analytics to Identify and Block Unlawful Traffic

AW Broadband relies on Telnyx’s use of call analytics systems to identify and block unlawful robocall traffic as set forth in its robocall mitigation plans on file with the FCC. Telnyx reports that it uses several tools to combat illegal robocalls, including, but not limited to, monitoring traffic patterns including answer success rates and average call duration, Do Not Originate (DNO) list blocking, and payment method tracking to block customers with suspicious payment activities. Telnyx also reports that it uses a third-party analytics provider, Nomorobo, to monitor traffic patterns through machine learning to alert its fraud team of suspicious activity or calling patterns.

If AW Broadband receives a report or alert from Telnyx of suspected unlawful robocall traffic originated by an AW Broadband end user customer, AW Broadband will conduct an investigation and will work internally to identify the party that is potentially originating illegal robocalls. To the extent a customer is found to have violated terms, AW Broadband 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.

Knowledge of Upstream Provider

AW Broadband only receives upstream traffic from its wholesale provider, Telnyx. AW Broadband has confirmed that Telnyx is registered in the FCC's Robocall Mitigation Database.

Cooperation with the Traceback Group, Law Enforcement and Government Agencies

AW Broadband 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 AW Broadband customers.

AW Broadband is also committed to cooperating with its wholesale provider on traceback requests and to fully complying with the Commission's robocall blocking requirements. AW Broadband understands that Telnyx will block 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 Commissions; or (3) include a caller ID number or name that is on the DNO list issued by the ITG.