



Robocall Mitigation Plan Description for Allpoint NetworkX, Inc.

STIR/SHAKEN Extensions:

Allpoint NetworkX, Inc. has received the following extension of the STIR/SHAKEN implementation deadline under §64.6304 of the FCC's rules:

- (1) the non-IP networks extension (§64.6304(d)).

All originating calls on the Allpoint NetworkX, Inc. network are subject to the Robocall Mitigation Program measures described below.

Trace Back Requests:

Allpoint NetworkX, Inc. commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that are discovered using our service to originate calls, within 24 hours.

Robocall Mitigation Measures:

- 1) Allpoint NetworkX, Inc. has implemented Stir/Shaken authentication on the updated portions of the network that generate originating calls over SIP trunks. This has been accomplished in conjunction with our underlying provider Sinch/Inteliquent Voyant Communications.
- 2) Allpoint NetworkX, Inc. has worked with our billing vendor to establish monitoring of originating call volumes by our customer base. Originating call records are summarized and compared to previous volumes to check for large increases in call volumes that appear unreasonable. If such volume changes are discovered, the company will investigate the change and take appropriate action with the customer.
- 3) Allpoint NetworkX, Inc. has the capability to monitor originating call volumes by customer line, and we have implemented a call volume trigger if originating call volumes for particular customer's line break a certain threshold during the course of a monitoring period.

Allpoint NetworX, Inc. has the following affiliates:

Alhambra-Grantfork Communications, Inc.
A-G NetworX, Inc.
Alhambra-Grantfork Telephone Company
Alhambra-Grantfork Cellular Telephone Co., Inc.

Company Information on Principals, Affiliates, Subsidiaries:

Allpoint NetworX, Inc. has a holding company affiliate, Alhambra-Grantfork Communications, Inc. The company also has a resale toll affiliate, A-G NetworX, Inc. an incumbent local exchange carrier affiliate, Alhambra-Grantfork Telephone Company, and a cellular investment affiliate, Alhambra-Grantfork Cellular Telephone Co., Inc. All of the affiliate companies are wholly-owned by the holding company Alhambra-Grantfork Communications, Inc. There is no principal or individual who owns a controlling interest Alhambra-Grantfork Communications, Inc., or who has control over the company operations.

The company officers are primarily responsible for the business operation and management of the company. The company officers are the following individuals:

President – Delmar Korsmeyer
Vice-President – Jed Schlechte
Secretary – Lawrence Henschen

Company Role in call chain:

Allpoint NetworX, Inc. has the call chain role of being a voice service provider with a STIR/SHAKEN implementation obligation serving end users.

Third Party Vendors used in call analytics:

The company does not utilize any third parties for call analytics at this point in time. At any point where the company employs a third party for the purpose of a call analytics application, the company will file a timely update to this plan document in the Robocall Mitigation Database.



Know Your Customer issues:

The company has know-your-customer procedures in place to prevent the abuse of the network related to illegal calls before they occur. The company requires customers to provide information on the physical location for service and a contact person for each service that is provisioned. The company also has documentation regarding acceptable use of service and the prohibition of the use of service for any fraudulent activities. The company has the right to suspend service or terminate service for any customer violation of the service terms.

Allpoint NetworkX, Inc. Primary Contact Information for Robocall related issues:

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