

Accelerate Networks ROBOCALL MITIGATION PROGRAM

Below is the Robocall Mitigation Plan filing for Accelerate Networks. This plan will be adapted to adjust to the latest laws, regulations, and industry best practices.

Monitoring

Accelerate Networks has monitoring and reporting systems in place to analyze voice network traffic to identify and monitor patterns consistent with robocalls. Our monitoring systems provide alerts on calling patterns with unusual spikes, traffic patterns, or attempted use of non-validated Telephone Number (TN) to detect patterns consistent with illegal robocalls.

If Accelerate Networks detects a pattern consistent with illegal robocalls, or we have reason to suspect illegal robocalling or spoofing is taking place over our network, we will seek to identify the party that is using our network to originate, route, or terminate these calls. and take appropriate action.

Appropriate action include:

- Validating that the originating party is authorized to use the TN.
- Suspending calling party's ability to originate, route, or terminate calls on Accelerate Networks network.

In 2025 we identified [REDACTED]

- [REDACTED]
- [REDACTED]

Traceback Cooperation

Accelerate Networks commits to responding in a timely manner (within 24 hours) and supporting all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG) and has repeatedly reached out to the ITG in attempts to collaborate on remediating the flood of inbound robocalls we have identified.

Robocall Mitigation Solution Overview

General information

- STIR/SHAKEN Transaction Detail Records (TDRs) are a primary data source.
- Improving STIR/Shaken attestation delivery on incoming and outgoing calls has been a routing improvement priority. All calls are attested with an A Level attestation.
- Each call is assessed through our in house model, leading to constantly refreshed view of call behavior and probability of a given number currently being used for robocalling.
- Active numbers are assessed by the model for behavioral attributes typically associated with robocalling including:
 - Neighbor spoofing events
 - Sudden spikes in volume, such as driven by call spoofing
- Do-Not-Originate (DNO) numbers are also deemed to be robocalls if they are the calling party number. This is sourced from industry (e.g.: US Telecom) and directly from enterprises.

- The service covers both US domestic and international TNs.
 - Calls originating from our network (i.e., Robocall Protection)
 - Provides detailed reporting identifying suspected illegal robocalls and alerts if calls originate where the calling number is invalid, unallocated, on a Do-Not-Originate list.
- If the platform detects a suspected robocalling patterns Accelerate Networks will take appropriate action which may include suspending or terminating the subscriber, or for inbound calls reaching out to the offending carrier.
- Supports a real time query to service to determine if a number originating on a network could be a robocall. Such calls will be blocked, or the terminating party can be notified via CNAM depending on our client's preference.
- For each new instance of robocalling using the Operating Service Provider (OSP)TNs, an alert is sent to the OSP in near real time using SIP 603+ and via CNAM. This alert will result in the OSP (manually) blocking the TN and all TSPs being alerted via CNAM , through an overlay such as "ROBOCALLER".
- The CNAM alerting helps address instances of spoofing of TNs that are not going through the OSP that owns the number.
- The business licenses of the Shaken Passport Signers are regularly reviewed, outreach to carriers listing invalid directors, officers or contact info is attempted, and if the Shaken Passport Signer will not file valid information in a timely fashion we will block in near real time using SIP 603+ rejects.
- Termination (i.e., Robocall Mitigation)
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]

Know Your Customer (KYC)

- [REDACTED]
- [REDACTED]
- [REDACTED]

Point of Contact

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Last updated February 28th 2026, certified by Dan Ryan. Signature: *Dan Ryan*