

American Voice and Data, Inc Robocall Mitigation Plan

Traceback Cooperation

- American Voice and Data, Inc will cooperate in traceback investigations. To allow for timely and comprehensive law enforcement efforts against illegal robocallers, American Voice and Data, Inc will dedicate sufficient resources to provide prompt and complete responses to traceback requests from law enforcement and from USTelecom's Industry Traceback Group. American Voice and Data, Inc has identified a single point of contact in charge of responding to these traceback requests and will respond to traceback requests as soon as possible within 24 hours.
- American Voice and Data, Inc will require traceback cooperation in contracts. For all new and renegotiated contracts governing the transport of voice calls, our contracts will specify the use of best efforts to require cooperation in traceback investigations by identifying the upstream provider from which the suspected illegal robocall entered its network or by identifying our own customer if the call originated in our network.
- Company address is American Voice and Data, Inc, 1950 E Greyhound Pass Suite 18139, Carmel IN 46033. Contact us for requests or further information at helpdesk@rivernetworks.com and telephone number 317.290.6558.

Subscriber Vetting Practices Business practices

Commercial retail end-users

- American Voice and Data, Inc will confirm the identity of commercial customers by collecting information such as physical business location, contact person(s), state or country of incorporation, federal tax ID, and the nature of the customer's business.
- American Voice and Data, Inc has call detail records to determine typical call volume and potential reasons for significant deviations from the typical call volume. American Voice and Data, Inc will determine if there are legitimate reasons for any customer to be making a number of high volume, short duration calls. American Voice and Data, Inc will contact any commercial business within 24 business hours of such deviations to determine if call volumes are legitimate.

Telephone Number Validation Practices

- Telephone Number Validation is necessary and appropriate when an End-User's right-to-use the telephone number is unknown to American Voice and Data, Inc. American Voice and Data, Inc will validate as necessary and appropriate.

Ongoing Mitigation Practices

- American Voice and Data, Inc will investigate suspicious calls and calling patterns. If American Voice and Data, Inc detects a pattern consistent with illegal robocalls, or if American Voice and Data, Inc otherwise has reason to suspect illegal robocalling or spoofing is taking place over our network, American Voice and Data, Inc will seek to identify the party that is using our network to originate, route, or terminate these calls and take appropriate action. American Voice and Data, Inc will monitor such things as high volume subscriber traffic, low duration subscriber traffic and sequential dialing patterns. American Voice and Data will take appropriate action that may include, but is not limited to, initiating a traceback investigation, verifying that the originating commercial customer owns or is authorized to use the Caller ID number, determining whether the Caller ID name sent to a receiving party matches the customer's corporate name, trademark, or d/b/a name, terminating the party's ability to originate, route, or terminate calls on its network, and notifying the appropriate authorities.