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Robocall Mitigation Plan

Company Name: Allied International Corp IT dba Envoi Networks Inc

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Company Phone #: (571) 620-2500

Pursuant to 47 C.F.R. § 64.6305 Allied International Corp IT dba Envoi Networks Inc submits this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls. This report describes the status of its implementation of STIR/SHAKEN and the practices and procedures Allied International Corp IT dba Envoi Networks Inc (hereinafter also referred to as “Envoi Networks” or “The Company”). The Company has a Robocall Mitigation Plan in place and may modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time to respond to changes in its business, its capabilities and its needs.

Envoi Networks is not an Affiliate or subsidiary of any other company and does not have a parent company. The company formerly operated as Allied International Corp IT before taking the name Envoi Networks Inc. The role the company plays in the network is Voice Service Provider for end user customers and has VOIP voice and FAX traffic on its network. The company provides voice, internet and security services to its business customers. The Officers of the company are **Paul Akhavan (CEO) and Kevin Riahi (CTO)**.

Envoi Networks has fewer than 100,000 subscribers and is therefore eligible for the STIR/SHAKEN implementation exemption for small carriers under 47 CFR § 64.6304. The company requires this extension to complete the implementation of the STIR/SHAKEN technology. Envoi Networks is a reseller of voice services and pays upstream providers to manage the technical side of their network. The company has implemented the following robocall mitigation plan to address unlawful robocall traffic:

Envoi Networks Inc has a very specific Acceptable Use Policy spelled out in its contracts. All violations of its Acceptable Use Policy can and will cause suspension and/or termination of services.

Envoi Networks confirms that the upstream providers have a certification in the Robocall Mitigation Database. We will not accept voice traffic from an unregistered provider. The Company has been informed of the upstream providers “Know-Your-Customer” guidelines and have provided them with the necessary KYC documentation they’ve requested that we complete.

Envoi Networks Inc does not allow its customers to use any callerID that is not one of their assigned numbers.

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Envoi Networks also validates, when possible, that the entity has a legitimate right to use its asserted calling numbers. The Company uses this information to support the attestation level it assigns to calls that it originates for that customer.

Envoi Networks contractual provisions with customers prohibit them from initiating illegal robocalls. If the Company discovers a customer is initiating suspicious robocalls, it warns them to stop. If such traffic continues, then the Company terminates their service.

Envoi Networks requires that upstream providers have a reasonable Robocall Mitigation Plan, including a vetting process for their customers as well as their upstream providers, and that they use call analytics to identify suspicious traffic.

Prior to installing services for new customers, the company takes the following measures to weed out end users that could potentially generate robocall traffic:

The Company uses a KYCs to confirm the following information for its customers:

- Customer's identity
- Customer's right to use the telephone number presented on calls
- Service Address
- Credit History
- Business Incorporation Documents

Envoi Networks Inc uses a proprietary call analytics program in their softswitch called "Enswitch". It monitors all outbound voice traffic in real-time to prevent the origination or transit of illegal robocalls.

The Company will investigate any identified suspicious calls to determine if the caller was attempting to originate or transit unlawful robocalls. Should the Company determine the traffic was likely unlawful, we reach out to the company contact to investigate immediately. If no satisfactory explanation is provided, we will move to suspend and/or terminate their services.

Envoi Networks will comply fully with all conditions set forth in the FCC'S 2024 Report and Order mandating the implementation of the STIR/SHAKEN framework, as well as with the Commission's rules and policies more generally.

Envoi Networks_ has designated an individual as a dedicated point of contact for addressing traceback requests. RMD Contact is **Kevin Riahi (CTO)**. It either has provided the ITG with the contact information and business hours for those individuals, or will do so upon receipt of the first request from the ITG. See <https://www.ustelecom.org/the-industry-traceback-group-itg/for-providers/>. The Company will respond promptly to inquiries from the Industry Traceback Group (ITG) within 24 hours.

If a pattern of questionable activity is detected Envoi Networks will require its customer to remedy the problem and, if effective action is not taken, service to the customer may be suspended and/or terminated. Requests from the ITG must be submitted in writing and include the following information:

Phone Number in Question:

Called Number

Date / Time Stamp

Requestor's Name:

Requestor's Title:

Requestor's phone number:

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Requestor's e-mail:

Envoi Networks will provide valid law enforcement and regulatory agencies with the relevant non-proprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities, and implement mandated Robocall Mitigation procedures to the fullest extent possible with the goal of maximizing the mitigation of illegal robocalls. We respond within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium. We cooperate fully with such entities in investigating and stopping any illegal robocallers that use the Company's service to originate, carry, or process illegal robocalls. Requests from the valid agency must be submitted in writing and include the following information:

Law Enforcement Agency Name:

Agency Address:

Requestor's Name:

Requestor's Title:

Requestor's phone number:

Requestor's e-mail:

Envoi Networks performs the same mitigation steps for all outbound calls regardless of our role in the call chain for a particular call. The Company has not had any agency action or investigation due to suspected unlawful robocalling or investigations.

Envoi Networks is subject to any Commission, Law Enforcement, or Regulatory Agency Action or investigation due to suspected unlawful robocalling or spoofing. Envoi Networks has no complaints filed against them.

Envoi Networks does not wish to publicize any private and/or classified information that has the potential to expose the Company to fraud and/or anti-competitive actions. Therefore, the Company will submit a redacted version for the public site and requests that the FCC keep the unredacted version

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