

Enhanced Communications Network, Inc
Robocall Mitigation Certification
STIR/SHAKEN Implementation
Robocall Mitigation Plan

Enhanced Communications Network, Inc, a voice service provider, submits this robocall mitigation certification and attached Robocall Mitigation Plan pursuant to section 64.6305 of the FCC's rules.

Enhanced Communications Network, Inc, provides voice service to our customers by reselling voice service provisioned by our wholesale providers, Alianza, Inc. and Bandwidth Inc. Accordingly, Enhanced Communications Network, Inc. relies on procedures, policies, and safeguards implemented by Alianza and Bandwidth to ensure that our residential and business customers are sufficiently protected against robocall and spoofing activities.

STIR/SHAKEN:

As indicated in the robocall Mitigation Database, Alianza and Bandwidth has implemented STIR/SHAKEN across its entire network. All calls that Enhanced Communications Network, Inc. originates are compliant with section 64.6301(a)(1) and (2) of the Commission's rules.

Enforcement:

All voice traffic that originates on Enhanced Communications Network's network is subject to the attached Robocall Mitigation Plan. Enhanced Communications Network reserves the right to modify and/or supplement its robocall mitigation plan to adapt to risks and to improve the overall effectiveness of its program.

Enhanced Communications Network and/or any entity for which the filing entity shares common ownership, management, directors, or control have never been subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program.

Enhanced Communications Network has not been prohibited by the Commission from filing in the Robocall Mitigation Database.

Traceback:

Enhanced Communications Network commits to cooperating with the Commission, law enforcement, and industry traceback consortium in investigating and stopping any robocalls that use our service to originate unlawful robocalls. Enhanced Communications Network will respond fully within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and cooperate with such entities in investigating and stopping any robocallers that use its service to carry, process, or originate robocalls.

Staff Training:

Enhanced Communications Network, Inc. will conduct regular training for all employees on their roles in upholding the STIR/SHAKEN mitigation plan, ensuring our team is well-informed and ready to combat robocalls while complying with regulations. Training will cover the STIR/SHAKEN framework, company policies, and employee responsibilities in our robocall mitigation strategy. Regular updates will also be provided to address any changes in regulations or company procedures, ensuring our workforce remains vigilant and proactive in this critical area.

Identifying and Other Information

Enhanced Communications Network, Inc.

d/b/a/ Asian American Association Telecom Services

Enhanced Communication Network is not a foreign voice service provider.

Principles: Helen Shih President

OCN: 810A, 128A, 159C 012F, 231E, 398F, reseller 550A

- Person within Enhanced Communications Network, Inc. responsible for addressing robocall mitigation-related issues:

Thomas J Haluskey, Director of Operations
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- Secondary Contact Enhanced Communications Network:
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I, Thomas J Haluskey, Director of Operations, for Enhanced Communications Network submits this certification on behalf of the Company, which has implemented the STIR/SHAKEN framework as indicated in the RoboCall Mitigation Database Pursuant to section 1.16 of the FCC's rules, I certify, under penalty of perjury that the information and statements contained herein are true and correct to the best of my knowledge and belief.

Respectfully submitted,



Thomas J Haluskey
Director of Operations
02/26/2024

Robocall Mitigation Program

Enhanced Communications Network, Inc d/b/a/ Asian American Association Telecom Services, (ECN) has implemented know-your-customer and specific steps, including traffic monitoring, to mitigate the risk of carrying or processing illegal robocalls on behalf of its customers.

As a reseller, ECN relies on Alianza's and Bandwidth's call analytics to monitor call traffic. Alianza has implemented a proprietary fraud detection and mitigation process through which it analyzes high volume network traffic to evaluate compliance with a variety of fraud detection indicators and fraud detection best practices. Through this fraud detection and mitigation process, Alianza will notify individual customers of potentially fraudulent activity occurring in any of that customer's subscriber accounts. Alianza may take remedial action against any subscriber's accounts to prevent or remediate robocalling or other fraudulent activity. If Alianza takes any such action, its fraud detection system triggers notification to the customer of that action and any remedial steps that may be taken to restore service.

In its Acceptance Use Policy, ECN strictly prohibits the origination of unlawful activity on the network.

- Robo Calling
- The intentional unsolicited spamming or mass e-mailing to any individual or groups.
- The intentional spoofing of a telephone number.
- The intentional unsolicited calling or text messaging of any individual or group.
- For any unlawful, invasive, infringing, defamatory or fraudulent purpose

Know-Your Customer: Our customers are members of the local community, that are small businesses, such as nail salons, liquor stores, restaurants, and dry cleaners that are part of the community we operate in. Therefore, we know our customers and do not consider our network at high risk of originating illegal robocalls. As part of our standard operating procedures, we conduct our due diligence on new and renewing voice customers by collecting personal identifiable information.

Know-Your-Upstream Provider: ECN's underlying voice service providers (Alianza, Bandwidth) have filed their Robocall Mitigation Database. Enhanced Communications relies on the Know-Your-Upstream Provider processes adopted by Alianza, who states that it has "existing Tier 1 carrier service providers" from which it facilitates the provision of carrier services to its service provider customer. Alianza has confirmed those carriers are listed in the Robocall Mitigation Database. Alianza has provided detailed onboarding and fraud detection guidance to require and enable its customers to comply with the obligation to prevent and mitigate illegal robocalls.

Traceback: ECN will respond fully and in a timely manner to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and cooperate with such entities in investigating and stopping any robocallers that use the network to originate robocalls.

Staff Training: ECN will conduct regular training for all employees on their roles in upholding the STIR/SHAKEN mitigation plan, ensuring our team is well-informed and ready to combat robocalls while complying with regulations. Training will cover the STIR/SHAKEN framework, company policies, and employee responsibilities in our robocall mitigation strategy. Regular updates will also be provided to address any changes in regulations or company procedures, ensuring our workforce remains vigilant and proactive in this critical area.