



Robocall Mitigation Plan

Company Name: Advanced Communications Solutions, LLC **499 Filer ID:** 826993

Company Address 4905 Del Ray Avenue, Suite 300
Bethesda, MD 20814

Filer Name: Roman Shpount

Filer Title: CTO

Filer Phone: (240) 847-0500

Filer E-mail: rshpount@turbobridge.com

Type of Voice Customers: Residential Enterprise Wholesale

Voice Service Provided Via ☐ Own NXXs ☒ Leased DIDs

STIR/SHAKEN Certificate: ☐ Use own ☒ Use 3rd party provider's

Participation in FCCs Enforcement Database		
Company Name	499 Filer ID	FRNs associated with 499
Advanced Communications Solutions, LLC	826993	0017-4331-78

Advanced Communications Solutions, LLC ("ACS") has implemented a Robocall Mitigation Program, as required by Section 4(b)(5)(C) of the TRACED Act and 47 C.F.R. §64.6305, as documented below.

Customer Vetting Process

ACS implements a rigorous "know your customer" process, specifically designed to prevent new and renewing customers from using its network to originate illegal calls. ACS vets the identity of the business and wholesale subscribers as part of the service initiation process. ACS requires information to identify the business, including legal business name, federal tax identification or corporate charter number (if a corporation), and complete business address. This information may be provided to third-party agencies to determine the credit and fraud risk associated with the potential customer. If ACS cannot validate the customer based on the initial information provided, ACS may require additional information to validate the business.

A customer that activates service with ACS is prohibited from abusive, fraudulent, or illegal use of any ACS services. If an ACS customer uses ACS service for abusive, fraudulent, or illegal purposes, ACS service agreements and service guides allow it to terminate service to that subscriber.

Monitoring Plan

ACS analyzes voice traffic to identify and monitor patterns consistent with robocall campaigns, fraudulent calls, or messages. If ACS detects a pattern consistent with illegal robocalls or otherwise has reason to suspect unlawful activity is taking place over its network, ACS will identify the party using its network to originate, route, or terminate these calls and take appropriate action. Such action 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, terminating, or suspending the party's ability to originate, route, or terminate calls on its network, or notifying law enforcement authorities.

Responding to Traceback Requests

ACS is committed to responding fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium and to cooperating with such entities in investigating and stopping any illegal robocallers that use its service to originate calls. ACS has designated a traceback response contact who is aware of the traceback requirements contained in 47 C.F.R. §64.1200(n)(1) and the obligations contained in 47 C.F.R. §64.1200(n)(2) in the event ACS receives the notification of a traceback request. ACS maintains current and correct information about its upstream customers so that it can provide accurate responses to traceback requests.

All requests for tracebacks must be issued in writing via letter, e-mail, or fax to the single point of contact listed below. The request for a traceback must include the following information:

- Company / Organization Name
- Company /Organization Address
- Requestor's Name
- Requestor's Title
- Requestor's phone number
- Requestor's e-mail

Single Point of Contact for Traceback Requests:

Roman Shpount

CTO

rshpount@turbobridge.com

General Compliance Inquiries:

Legal Department

legal@turbobridge.com