

Allbridge LLC

ROBOCALL MITIGATION PLAN

Allbridge LLC (“Allbridge”) offers interconnected VoIP services through the resale of services of BluIP, Inc. (“BluIP”), EvolveIP, LLC (EvolveIP), and Clearly IP Inc. (“Clearly IP”). While Allbridge necessarily relies on the robocall mitigation policies, procedures, and safeguards instituted by its wholesale providers, Allbridge has also adopted this robocall mitigation plan to take its own measures to limit the potential for the origination of unlawful robocalls by its customers.

Know-Your-Customer Policies

Subscriber Vetting: Allbridge vets the identity of its customers before initiating telephone service. As part of this vetting process, Allbridge visits each location where service will be provided and collects the customer’s legal name and address, physical location, contact information, federal tax ID, and the nature of the business. This information enables Allbridge to validate the identity of potential customers prior to provisioning of service. Allbridge will not provide services if a new customer’s identification cannot be verified.

Contractual Terms: Allbridge’s Acceptable Use Policy (AUP) prohibits unlawful robocalls and allows Allbridge to block calls and/or terminate service for violations.

Use of Call Analytics to Identify and Block Unlawful Traffic

Allbridge necessarily relies on its wholesalers’ use of call analytics systems to identify and block unlawful robocall traffic as set forth in their robocall mitigation plans on file with the FCC.

BluIP reports that it uses call analytics software provided by TransNexus to monitor all outbound voice traffic in real-time to prevent the origination or transit of illegal robocalls and that the software provides detailed reporting to identify suspected illegal robocalls. BluIP also reports that the TransNexus system alerts BluIP if the calling number has a poor reputation, is invalid, unallocated, or on a Do Not Originate (“DNO”) List, and that BluIP performs the same mitigation steps for all outbound calls regardless of its role in the call chain for a particular call.

EvolveIP reports that it employs call analytics to identify and block illegal traffic by using both internally prepared reporting and with the assistance of third-party software provided by TransNexus and Equinox Protector.

Clearly IP reports that it does not use third-party vendors in connection with call analytics but that it works to detect a calling pattern consistent with illegal robocalls and takes action if it identifies a party that is using its network to originate such calls.

If Allbridge receives a notification from one of its wholesale providers of suspected unlawful robocall traffic originated by an Allbridge end user customer, Allbridge will conduct an investigation. To the extent a customer is found to have violated Allbridge’s AUP, Allbridge will

take action commensurate with the severity of the customer's offense, including, but not limited to, providing the customer with a warning or terminating the customer's service.

Knowledge of Upstream Providers

Allbridge only receives upstream traffic from its wholesale providers. Allbridge has confirmed that these providers are registered in the FCC's Robocall Mitigation Database.

Cooperation with the Traceback Group, Law Enforcement and Government Agencies

Allbridge is committed to responding fully and within 24 hours to all traceback requests made by the Industry Traceback Group ("ITG"), law enforcement authorities, and government agencies to investigate and address suspected unlawful robocalls originated by Allbridge customers, and to cooperating with its wholesale providers on traceback requests.