



Robocall Mitigation Policy

Objective: Establish and follow a policy compliant with TRACED Act

I. Overview

- a. The FCC requires that all providers certify in the Robocall Mitigation database that they are in compliance with STIR/SHAKEN. Those not yet fully compliant must implement and certify the implementation of a Robocall Mitigation Plan which will ensure illegal traffic does not originate on their networks while working towards full compliance.
- b. This mitigation plan is submitted on behalf of Accent Communication Services, Inc., an Interconnected VoIP Provider hereafter referred to as Accent throughout this document.

II. General Prohibition Against Illegal Robocalling

- a. Accent customers are subject to restrictions contained in its Terms of Service (TOS) and Master Service Agreement (MSA), collectively referred to as Terms hereafter, and agree to abide by the requirements set forth within those respective documents.
 - i. Accent's Terms prohibit activities normally associated with Robocalling including but not limited to:
 - 1. Providing altered, deceptive, or false caller ID information
 - 2. Violating local, state, or federal laws while utilizing the service
 - 3. Using predictive dialer technology
 - 4. Having anyone/anything other than a human regularly initiate outbound calls
 - ii. Accent regularly reviews its Terms and customer traffic for compliance with the Terms. Accent regularly issues necessary updates to comply with all applicable regulations and updates customers as appropriate for corrective action.

III. Know Your Customer

- a. Accent utilizes the mitigation technique of "Know Your Customer." Accent maintains a close relationship with its customers and does not provide outbound voice services to customers that are not vetted to ensure their voice traffic meets Accent's standard of voice traffic quality.
- b. Accent regularly reviews service utilization records with customers to ensure usage is consistent with the customer's stated business goals.

IV. Traffic Monitoring and Auditing

- a. Accent implements automated service monitoring on customer voice traffic that will alert Accent personnel to any unusual traffic or usage patterns on the service.

- b. Accent regularly audits calls traversing its network for valid caller ID information and traffic patterns inconsistent with legitimate usage.

V. Traceback and Enforcement Cooperation

- a. Accent will actively cooperate with the traceback community, including the FCC, law enforcement, and The Industry Traceback group (ITG) to investigate and stop illegal robocalls. Accent will dedicate sufficient resources to provide prompt and complete responses to traceback requests.
- b. Accent commits to fully responding to all traceback requests from the ITG, the FCC, and law enforcement within 24 business hours.