

Vital/Allworx Robocall

Mitigation Plan

Introduction

Vital/Allworx Inc. ("Company" or "Allworx") provides high-bandwidth internet and digital voice services to business customers. Allworx only serves as a Voice Service Provider. It is not an Intermediate Provider (i.e., it is not a Gateway Provider and is not a Non-Gateway Intermediate Provider).

Allworx does not have an Operating Company Number ("OCN"). Pursuant to 47 C.F.R. § 64.6305(d)(4)(vi), Allworx's role in the call chain is as a Voice Service Provider that purely resells VoIP services of VoIP Innovations.

Certification

Company, by submitting this RMP, hereby certifies that (a) all calls originating on its network are subject to this RMP which satisfies the FCC's requirements, (b) any prior certification of the Company has not been removed by Commission action and (c) Allworx (including any parent and affiliates) has not been prohibited from filing in the Robocall Mitigation Database ("RMD") by the Commission. The Company has also certified that it has fully implemented STIR/SHAKEN across its network and all calls it originates are compliant with Commission rules. Allworx (and any parent, affiliate or any entity that shares common ownership, management, directors, or control) has not been the subject of any 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 RMD certification or RMP description.

Only Accepting Traffic from Providers that Have Affirmatively Filed in the RMD

In accordance with FCC rules referenced below, Allworx only accepts traffic from providers that at a minimum satisfy the following requirements:

- Accepting traffic from domestic Voice Service Providers. In accordance with 47 C.F.R § 64.6305(g)(1), Allworx accepts calls directly from a domestic Voice Service Provider only if that Voice Service Provider's filing appears in the RMD and that filing has not been de-listed pursuant to an enforcement action.
- Accepting traffic from Foreign Voice Service Providers or Foreign Intermediate Providers. In accordance with 47 C.F.R § 64.6305(g)(2), Allworx accepts calls from Foreign Voice Service Providers or Foreign Intermediate Providers that use NANP resources that pertain to the U.S. in the caller ID field to send voice traffic to residential or business subscribers in the U.S., only if that foreign provider's filing appears in the RMD in accordance with paragraph and that filing has not been de-listed pursuant to an enforcement action.
- Accepting traffic from Gateway Providers. In accordance with 47 C.F.R § 64.6305(g)(3),

Allworx accepts calls directly from a Gateway Provider only if that Gateway Provider's filing (a) appears in the RMD, (b) shows that the Gateway Provider has affirmatively submitted the filing, and (c) has not been de-listed pursuant to an enforcement action.

- Accepting traffic from Non-Gateway Intermediate Providers. In accordance with 47 C.F.R § 64.6305(g)(4), Allworx accepts calls directly from a Non-Gateway Intermediate Provider only if that Non-Gateway Intermediate Provider's filing (a) appears in the RMD, (b) shows that the Non-Gateway Intermediate Provider has affirmatively submitted the filing, and (c) has not been de-listed pursuant to an enforcement action.

Allworx's Know Your Upstream Provider procedure involves checking the RMD to see if the Provider's filing (a) appropriately appears in the RMD, (b) shows that the provider has submitted the applicable filing, and (c) has not been de-listed pursuant to an enforcement action. As indicated below, VoIP Innovations serves as Allworx's Intermediate Provider, and is currently and appropriately listed in the RMD, and Allworx does not directly connect to any other provider, so all traffic that Allworx originates or terminates is carried or processed by VoIP Innovations. Because Allworx does not directly connect to any other provider, all traffic that Allworx originates or terminates is carried or processed by VoIP Innovations and therefore Company satisfies the above requirements.

Traceback Cooperation

Allworx will cooperate in traceback investigations. To allow for timely and comprehensive law enforcement efforts against illegal robocallers, Allworx will dedicate sufficient resources to provide prompt and complete responses to traceback requests from law enforcement and from US Telecom's Industry Traceback Group. Allworx has identified a single point of contact in charge of responding to these traceback requests and will respond to traceback requests as soon as possible or within 24 hours.

Allworx will require traceback cooperation. For all new and renegotiated service applications governing the transport of voice calls, our policy will specify the use of best efforts to require cooperation in traceback investigations by identifying the upstream provider from which the suspected illegal robocall entered its network or by identifying our own customer if the call originated in our network.

Implementing Knowing Your Customer and Upstream Providers Protocols

The FCC requires that a Voice Service Provider's RMP "describe with particularity" its robocall mitigation techniques as follows: (1) a Voice Service Provider must describe how it is meeting its existing obligation to take affirmative, effective measures to "know its customers" and prevent new and renewing customers from originating illegal calls; and (2) Voice Service Provider must describe any "know-your-upstream provider" procedures in place designed to mitigate illegal robocalls. To comply with the requirements to describe their "new and renewing customer" and "know-your-upstream provider" procedures, such providers must describe any contractual provisions with end-users or upstream providers designed to mitigate illegal robocalls. Allworx's contractual provisions with its customers are described below.

Allworx has implemented Know Your Customer and Upstream Provider procedures used when onboarding new or renewing customers to ensure that such customers and providers do not or are not likely to engage in any prohibited conduct. If the customer is a Voice Service Provider, Gateway Provider, Non-Gateway Intermediate Provider, Foreign Voice Service Provider, and/or Foreign Intermediate Provider, Allworx confirms that the provider is appropriately listed in the FCC's RMD and has not been delisted pursuant to an enforcement action before accepting traffic from the

provider. As indicated above, VoIP Innovations serves as Allworx's Intermediate Provider, which is currently and appropriately listed in the RMD, and Allworx does not directly connect to any other provider, so all traffic that Allworx originates or terminates is carried or processed by VoIP Innovations.

With these measures and procedures along with those discussed herein, below, Allworx takes "affirmative, effective measures to (1) prevent new and renewing customers from using its network to originate illegal calls, including knowing its customers and exercising due diligence in ensuring that its services are not used to originate illegal traffic" and (2) know its upstream providers.

Requiring Contractual Provisions to Mitigate Illegal Robocalls

In satisfaction of the FCC's requirements that a provider "know its customers" procedures, below are descriptions of Allworx's contractual provisions with end-users that are designed to mitigate illegal robocalls. Allworx's voice service customers are subject to Allworx's Terms of Service, which includes provisions that (a) prohibit customers from using Allworx's services in a malicious manner, (b) permit Allworx to terminate service to its customers at any time and with or without notice to its customers, and (c) permit Allworx to access customer accounts and records to investigate complaints or allegations of abuse or unauthorized uses without disclosure to customer unless required by law.

Under its Terms of Service, Allworx has the right to amend its Terms of Service from time to time without notice, and the customer is responsible for compliance with the then current Terms of Service. Allworx's Terms of Service are available at www.allworx.com.

Validating Customer's Right to Use Telephone Numbers

When Allworx establishes service to a retail end user voice customer, Allworx confirms the end user customer has a verified association with the telephone numbers it uses for its originating telephone calls. In this connection, Allworx either assigns the telephone numbers to its VoIP end user customers or ports an existing end user's customer telephone number on to Allworx's network.

Moreover, in providing VoIP services, Allworx preprograms each switch so that it only allows DIDs assigned to the end user to be passed to Caller ID. With this preprogramming, Allworx's end user customers cannot change the Caller ID telephone number they have been assigned and cannot otherwise engage in spoofing. This preprogramming occurs for all of Allworx's VoIP customers, whether the end user customer ported its telephone number from another provider to Allworx or Allworx assigned the telephone number to the end user customer. In addition, when using Allworx's VoIP service offering, such end user customers cannot simultaneously send numerous calls over a few voice paths. For these reasons, Allworx does not consider its end user customers to be at high risk of originating illegal robocalls or spoofed calls on Allworx's network. Nevertheless, Allworx has adopted various measures discussed below to prevent the origination of such calls on its network.

Analyzing and Monitoring Network Traffic Routing Through Allworx's Voice & Data, LLC's Network

If Allworx observes a high-volume voice traffic on its network (which would be highly unlikely for the reasons noted above), Allworx will analyze such traffic to identify and monitor patterns consistent with robocalls. For example, Allworx may employ tools to detect and act on such patterns. Allworx does not use a third-party analytics vendor.

If suspicious calling patterns are found, Allworx, after further investigation, takes appropriate action to address such behaviors. If the calls are determined to be illegal robocalls originating on Allworx's network, Allworx's service to the end user customer originating such calls will be suspended or terminated. If the robocalls are illegal and terminating on Allworx's network, Allworx will work with its Intermediate provider to address and block such traffic.

Investigating Suspicious Calling Patterns

If Allworx detects a pattern consistent with or specific to illegal robocalls (including large bursts of traffic in small timeframes, low duration subscriber traffic and sequential dialing patterns, or call pattern that is consistent with illegal robocalls), or if it otherwise has good reason to suspect illegal robocalling or illegal spoofing is taking place over its network, Allworx will seek to identify the party that is using its network to originate, route, or terminate these calls and take appropriate action. Allworx may take such actions including, but are not limited to, initiating a traceback investigation; verifying that the originating customer owns or is authorized to use the Caller ID number; determining whether the Caller ID name sent to a receiving party matches the customer's name, trademark, or d/b/a name; reviewing complaints; suspending or terminating the party's ability to originate, route, or terminate calls on its network; and notifying law enforcement authorities. Allworx recognizes that foreign originating traffic that uses +1 USA Caller-ID values requires special scrutiny; however, Allworx does not originate foreign originated traffic on its network.

Notably, if calls are determined to be illegal robocalls originating on Allworx's network, Allworx's service to the end user customer will be suspended or terminated in accordance with Allworx's Terms of Service discussed above. If the robocalls are illegal and terminating on Allworx's network, Allworx will work with its Intermediate provider to address and block such traffic. To ensure that Allworx's residential and business end users and Allworx's network are protected from illegal and potentially fraudulent call traffic, and consistent with contractual limitations and legal considerations, Allworx takes these appropriate steps to combat such traffic being originated, terminated, or carried or processed on its network.

Designating an Employee Responsible for Addressing Robocall Mitigation-Related Issues

To further ensure Allworx's network is not utilized for the origination, termination, or carrying or processing of unwanted and illegal robocalls, Allworx provides the following name, title, department, business address, telephone number, and email address of the individual within Allworx that leads Allworx's team that handles robocall mitigation-related issues as well as responds to traceback inquiries from the FCC, ITG, and law enforcement agencies:

Contact: Mark Stappenbeck Contact Title: Integration and Support Engineer

Contact Department: Main Office

Contact Street Address: 5130 S. Ft. Apache Road
#215-249

Contact City State and Zip Code: Las Vegas NV 89148

Contact Telephone Number: 585 421 3850

Contact Email: FCC.Compliance@allworx.com

Updates to Allworx's RMD Submission and RMP

The Company agrees to update its submission in the RMD within ten (10) business days of any change to the applicable information it must provide and update in the RMD.