

IM Telecom, LLC dba Infiniti Mobile
Robocall Mitigation Plan

Introduction

This document details the reasonable steps and actions taken by IM Telecom, LLC dba Infiniti Mobile (“Infiniti Mobile”) to mitigate and eliminate illegal robocalling. Infiniti Mobile has an ongoing commitment to scan for and help alleviate illegal robocalling by pre-qualifying prospective customers, monitoring existing customers for traffic patterns indicative of prohibited robocalls, and working with other providers and regulatory agencies in combatting fraudulent voice activity.

Infiniti Mobile provides retail wireless calling services, primarily to lifeline and ACP subscribers. All telecom services are provided on a resale-only basis. As a wireless reseller, Infiniti Mobile is dependent on our underlying carrier’s (“ULC”) assistance with monitoring their networks for fraudulent voice calling patterns.

Know Your Underlying Carrier

IM Telecom, LLC dba Infiniti Mobile has master service agreements in place with our nationally known underlying carriers and has received written assurances from their officials that it has and will continue to sign calls submitted to IM Telecom, LLC dba Infiniti Mobile and will abide by the FCC’s STIR/SHAKEN and robocall mitigation rules in all respects when providing voice services to Infiniti Mobile. Infiniti Mobile and its upstream providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Know Your Customer

Infiniti Mobile uses the lifeline application information provided to us and we also use a third party's system to generate approved numbers. Once approved through the national verifier we approve the end user’s order. We use the name, physical address, contact information, and private information to vet the identity of our subscribers. During this process, Infiniti Mobile requests and obtains personal information from its applicants and subscribers to reasonably establish and confirm their identity and eligibility to qualify for ACP and or federal Lifeline, and confirm they may enroll with the provider to receive these programs. This information is also utilized to identify subscribers if any non-compliant or illegal activities are identified.

Infiniti Mobile screens all applicants to verify information about each subscriber. We monitor subscriber usage of programs and will refuse services to any customer that is using the service for illegal robocalling or other fraudulent call activity.

In our research of the prospect, Infiniti Mobile will not activate clients that provide anonymous information or where data mismatches are found.

Traceback Requests

Infiniti Mobile is committed and will respond fully within 24 hours to all Traceback Requests from the FCC, law enforcement agencies, and the industry traceback consortium and vows to cooperate with these agencies in investigating and stopping any illegal robocallers that use our service to make calls. Infiniti Mobile will devote sufficient resources to provide prompt and complete information to traceback requests. Our points of contact to handle all traceback requests are:

David Avila

CEO

davilla@infinitimobile.com

Paul Greenwood

VP Operations

pgreenwood@infinitimobile.com

Additionally, Infiniti Mobile follows the following best practices to facilitate its responses to traceback requests. The company's process includes the following process steps:

- Coordination of Requests. Coordinates with the FCC, law enforcement, ITG, and other voice service providers when suspicious traffic is identified.
- Confidentiality of Traceback Investigations. Information about traceback investigations is not shared, except with the ITG, with other providers involved in the traceback investigation, or when pursuant to a legal process.
- Periodically reviews records of traceback requests to identify suspended or terminated subscribers to determine what action to take with the offending subscriber, which includes but is not limited to working to mitigate illegal traffic, temporary suspension, and termination of the service. If the subscriber is enrolled in the ACP or federal Lifeline program, any suspension or termination of service would be handled per FCC requirements.

If a traceback exposes an existing customer as the source of fraudulent robocalls, or as having transmitted fraudulent robocalls, a demand for an explanation and verification of mitigation of the traffic is issued to the customer. If the fraudulent traffic is not remediated, Infiniti Mobile immediately begins rejecting all traffic from the offending customer.

Telephone Numbers

Enrolling subscribers with Infiniti Mobile may bring their own telephone or request to change it with the company, subject to FCC requirements as applicable. A third-party validation service is not used as the company relies on internal tools and resources.

International Calling

Infiniti Mobile is not currently an international voice services provider. If at any time Infiniti Mobile does decide to sell our services to international customers using North American Numbering Plan resources, we will familiarize ourselves with and develop best practices for full vetting of such customers and work with our underlying carrier to perform the necessary telephone number validation on all international originated calls.

Call Analytics

Infiniti Mobile utilizes internal tools to analyze usage patterns by its subscribers in order to identify potential illegal traffic. This process involves these steps:

- Monitor excessive voice usage to identify potential abusive use, using a fair usage quota of 10,000 minutes.
- Monitors excessive text usage that could be considered abusive based upon a fair usage quota of < 1000 text per 15 minutes.
- Responds to downstream carrier alerts/complaints by suspending or disconnecting lines when abusive or excessive usage is identified.
- Also reliant upon Infiniti Mobile's ULC procedures to partner together for indentifying potential abusive traffic and acting accordingly based upon investigation findings.

Ongoing Robocall Mitigation

Infiniti Mobile has an acceptable use policy and additional guidance in its terms & conditions that describe steps taken to mitigate its subscribers' non-compliant or abusive traffic on its network. Actions include:

- Closely monitors excessive voice usage that could be considered abusive based upon a fair usage quota of 10,000 minutes alerting the company to suspicious use.
- Closely monitors excessive text usage that could be considered abusive minding a fair usage quota of < 1000 text per 15 minutes.
- Responds to downstream carrier alerts/complaints by suspending or disconnecting lines portraying confirmed abusive or excessive usage.
- Partners with its ULCs to receive and act upon alerted potential abusive traffic.
- Performs appropriate customer outreach.
- Notates customer accounts in the company's operating system.
- Responds to customer requests to change MDNs due to spam calls.
- Reviews subscriber usage for high/low use on a regular interval to identify potential outliers necessitating action.

- Offers voice-enabled devices that have the capability to block any number per user discretion. To the best of Infiniti Mobile's understanding, its partnering ULCs identify and block calls from providers that have not filed in the Robocall Mitigation Database. Due to this occurring at the network level, Infiniti Mobile does not have control over this.

Infiniti Mobile Contact for Robocall Mitigation-Related Issues

The Company will update our Robocall Mitigation filings within 10 business days of any change to the information outlined in this plan. Please direct any questions related to Robocall Mitigation issues to:

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