



Robocall Mitigation Plan

Network Services Telecom Group, LLC (dba Anavon Technology Group) (the “Company”) is committed to cooperating with the Federal Communications Commission (FCC), law enforcement, and the industry traceback consortium in investigating and stopping any illegal robo callers that it learns are using our service to originate calls or transit calls into the United States and territories.

We are a reseller of Windstream Communications LLC (RMD0012713) and BlueEdge Technologies LLC (RMD0012254) VoIP Hosted Services and do not have the capability to implement STIR/SHAKEN. Windstream Communications LLC and BlueEdge Technologies LLC have implemented STIR/SHAKEN protocols in their IP Voice networks.

We have not been prohibited from filing a certification in the Robocall Mitigation Database.

Network Services Telecom Group, LLC (dba Anavon Technology Group), nor any of our executives or principals have a history of enforcement actions for illegal robocalls, TCPA or TSR violations or related state law violations.

We use the affirmative and effective measures detailed below to prevent the origination or transit of illegal robocalls.

The Company commits to fully responding within 24 hours to all traceback requests from the ITG, the TPTG, the FCC, and law enforcement. The Company shall cooperate with these groups to investigate and stop any illegal robo callers from using Company’s service to carry or process illegal calls. When notified by the FCC’s Enforcement Bureau, Company shall block and report identified illegal traffic, and any substantially similar traffic, on an ongoing basis (unless Company’s investigation determines that the traffic is not illegal) when Company receives actual written notice of such traffic from the Enforcement Bureau. If Company determines that the identified traffic is not illegal, Company shall provide the Enforcement Bureau with an explanation as to why Company reasonably concluded that the identified traffic is not illegal, and what steps it took to reach that conclusion.

The Company utilizes a combination of internal tools and third-party solutions to check for Do Not Originate (DNO) numbers. In addition, the Company utilizes a combination of internal tools and third-party solutions to detect invalid phone number formats, area codes and unassigned number blocks. The Company also utilizes data analytics to detect and investigate irregular and unexpected calling patterns, originating number use against customer profiles.

The Company uses data systems for analytics and reviews to identify illegal robocalling in addition to a Know Your Customer (KYC) requirement to access the Company’s networks.

The process includes:

- Monitoring the network to identify suspicious traffic patterns.
- Limiting customers' capacity via call per second and/or concurrent session limits.
- Regularly checking call patterns for possible abusive traffic.

- All new customers are verified with a combination of electronic and manual verification systems, credit reviews, references from trusted industry members, and previous experiences with customer executives and employees. The Company severely limits the capabilities of new accounts until these appropriate processes are complete.

Network Services Telecom Group, LLC (dba Anavon Technology Group) has two VoIP Hosted providers:

1. Windstream Communications, LLC (RMD0012713)
4001 Rodney Parham Rd.
Mailstop 1170, B1F01-
1114B
Little Rock, AR 72212
Phone: 7501-748-7000
Email: jason.wayne@windstream.com
2. BlueEdge Technologies, LLC (RMD0012254)
310 Passaic Avenue
Suite 204
Fairfield, New Jersey 07004
Phone: 201-625-1133
Email: Hgop@blueedge.io

The Company reserves the right to refuse traffic from any party at any time where robocalling or use of originating numbers that are not valid or they are not authorized to use has occurred or is suspected. The Company is able to block the originating number(s), terminating numbers(s), trunk(s) or customer, including termination of customer relationship to prevent robocalling, invalid originating number or spoofed origination number transiting the Company's networks.

In addition, we have implemented a Call Abuse Policy, as it pertains to the TRACED Act, and have published the following policy to our web site, terms of use, and have notified our customers of the policy as copied below:

"Any call originated on Network Services Telecom Group, LLC (dba Anavon Technology Group) network is subject to inspection and investigation if the call is suspected of being fraudulent, abusive, or illegal. Calls meeting any of these criteria will be blocked. If these conditions are repeated, becoming excessive, the subscriber may be disconnected from Network Services Telecom Group, LLC (dba Anavon Technology Group) network, may be subject to further investigation by the FCC for enforcement of the TRACED Act and the subscriber may be subject to fines and penalties imposed by the FCC or the jurisdictional court."