

Aristotle Unified Communications Inc STIR/SHAKEN Certification

Aristotle Unified Communications Inc (f/k/a Aristotle Unified Communications L.L.C.; “Aristotle”) is a small, facilities-based voice service provider (“VSP”) dedicated to stopping illegal calls from originating in our network and monitoring the calls coming into our network. Aristotle is a reseller of white-labeled services offered by Atheral LLC (FRN 0028070290) for which Aristotle does not control the softswitch or call trunking for the associated calls. In the Second Caller ID Authentication Report and Order, 36 FCC Rcd 1859, 1868, para. 19 (citing First Caller ID Authentication Report and Order, 35 FCC Rcd at 3260, para. 40), the Commission stated that such providers do not have a STIR/SHAKEN obligation (“And we clarified that voice service providers which lack control over the network infrastructure necessary to implement STIR/SHAKEN are not subject to our implementation requirements.”)

Aristotle uses Vitelity as a vector for purchasing and porting numbers and directs those numbers to a NetSapiens server hosted by Atheral LLC. From Atheral, Aristotle purchases origination, termination, and hosted-switch access which also provides crucial elements of our RMP as part of Atheral’s interconnected white-label VoIP wholesale services to us. All voice traffic that originates on our network is subject to the RMP described below, and customers have the ability to block numbers and set rules.

Know Your Customer

Aristotle, in partnership with Atheral, follows the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>), including investigating new and renewing customers seeking access to high-volume origination services and, if necessary and possible, modifying service terms and conditions to mitigate the potential of any new or renewing customer originating illegal robocalls.

Aristotle confirms the identity of all of its customers including, but not limited to (i) contract person(s); (ii) business location, (iii) state or country of incorporation, (iv) federal tax identification, and (v) nature of our customer’s businesses.

International Subscribers

Aristotle does not sell origination or termination services to subscribers outside the United States.

Contractual Terms - Acceptable Use Policy

Aristotle maintains Terms and Conditions (“T&C”) for use of our broadband or voice services. Among other things, these T&C prohibit:

- Use for any criminal or unlawful purposes;
- Use for the transmission, creation, or storage of any material in violation of any State or Federal laws or regulations, including, but not limited to; any material:
 - That is in violation of United States Copyright laws;

- That is in violation of United States Trade Secret Laws;
- That is in violation of United States Trademark Laws;
- That is threatening or obscene; or
- That is in violation of the Electronic Communications Privacy Act of 1986, Cit.18 U.S.C. 2150 et. Seq.

Customers are informed that any violation of use of the services may result in termination of service.

Traceback Requests

Aristotle is committed to respond within 24 hours to all traceback requests from the Federal Communications Commission, law enforcement, Atheral LLC, and the industry traceback consortium. Furthermore, Aristotle is committed to cooperating with such entities in investigating and stopping any illegal robocallers that use Aristotle service to originate calls. Subscribers are required to comply with traceback requests via our T&C. Traceback requests can be sent to auc.reg@Aristotle.net for immediate processing by Aristotle.

Telephone Number Validation

If a subscriber wishes to use a telephone number (TN) as a caller identity and that TN is not directly managed by Aristotle or our wholesale partner Atheral LLC or Vtelity, TN validation is necessary by requiring the subscriber to provide a valid letter of authorization that they are an authorized user of such TN.

Investigation of High-Volume Network Traffic, Suspicious Calls, and Calling Patterns

Atheral LLC uses TransNexus's ClearIP solution to monitor our origination voice traffic in realtime to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts Atheral LLC if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database, or has a poor reputation. Atheral will immediately ask Aristotle to investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If Aristotle or Atheral LLC determines that the caller was attempting to originate unlawful robocalls, our policy is to warn them to stop, suspend their service, and/or terminate their account.

Examples of calling patterns monitored:

- Higher than expected cost generated by calls from a subscriber
- Targeted pumping of repeated calls to a specific called number within a 15-minute period
- Fast traffic pumping of repeated calls to a specific called geographic location within a 5-minute period
- Slow traffic pumping of repeated calls to a specific called geographic location within a 60-minute period
- Theft of service traffic pumping of repeated calls to a high-cost geographic location within a 60-minute period

- Recent call volumes (last 60 min) vs weekly trends
- Number of unique destination numbers in a 60-minute time frame
- Irregularities in Short Call Duration (SDC) and Average Call Duration (ACD) distribution
- Anomalies in Answer-Seizure Ratio (ASR)
- Robocalling triggers monitoring for a high volume of outbound calls or excessive incoming calls from the same calling number
- Wangiri trigger monitoring for origination calls to high termination rate destinations with short duration (to trigger end-users to call back) for all calls over a 5-minute duration
- Analysis of recent and past Call Detail Records (CDRs) to benchmark against expected trends

STIR/SHAKEN Implementation and Updates

Pursuant to FCC filings, Atheral LLC and Vitelity have fully implemented STIR/SHAKEN. Aristotle will continue to monitor industry best practices and review internal processes to ensure our systems will adapt to address the ongoing challenges affecting this industry.