

Alliance Global Networks, LLC
Robocall Mitigation Plan

Introduction

This document details the reasonable steps and actions taken by Alliance Global Networks, LLC (“Alliance”) to mitigate and eliminate illegal robocalling. Alliance 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. Alliance is a non-gateway Intermediate provider that provides wholesale data and voice telecommunications services to carrier and reseller customers.

Know Your Upstream Provider

Alliance Global Networks, LLC has master service agreements with our provider partners and has received written assurances from their officials that it has and will continue to abide by the FCC’s STIR/SHAKEN and robocall mitigation rules in all respects when providing voice services to Alliance. Alliance 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

Subscribers / customers are communicated with in person and by telephone prior to and after the start of a business relationship. Interviews through meetings discuss the type of business and traffic the subscriber uses. New Subscribers are generally referred by a reputable known source. A legal contract is executed which includes subscribers/customers obligation and commitment to not send illegal traffic or take part in any illegal dealings.

Contracts include legal place of business address, officers’ signature, contact information, state of business registration, type of business (corporation, LLC, etc). A credit review is conducted for each subscriber / customer. Bank information is confirmed. Several Trade References are confirmed. Tax Forms are completed by subscribers/customers including Tax ID number. Subscribers/customers must be listed in the RMD and complete the Know Your Customer Form in detail with a plan.

In our research of the prospect, Alliance will not activate clients that provide anonymous information or where data mismatches are found. Additionally, prospects are required to agree to Alliance’s strict policies and contractual terms prohibiting the act of fraudulent voice activity as a condition of doing business with Alliance. Individuals associated with prospects or current customers who have been known to act improperly or otherwise be involved in fraudulent robocalling will cause their companies to be rejected by Alliance as a customer and any existing customer relationships could potentially be severed.

Traceback Requests

Alliance 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. Alliance will devote sufficient resources to provide prompt and complete information to traceback requests. Our point of contact to handle all traceback requests is:

NOC Team

troubleticket@alliancegrp.com

shawng@alliancegrp.com

robp@alliancegrp.com

We currently receive notification from the traceback portal via email when new traceback requests are found to have traversed our network. We have maintained a history of quickly responding to these requests for over a year. We make use of call logs directly from our switch to identify upstream providers for traceback assignment.

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, Alliance immediately begins rejecting all traffic from the offending customer.

Telephone Numbers

A Telephone Number ("TN") based caller identity is the originating phone number included in call signaling used to identify the caller for screening purposes that is uniquely associated with the subscriber. Wholesale subscribers / customers must be listed in the RMD. Subscribers complete and sign a "Know Your Customer Form" in detail with plan to ensure all calls are validated.

International Calling

Alliance is not currently an international voice services provider. If at any time Alliance 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 to perform the necessary telephone number validation on all international originated calls.

Call Analytics

Our platform identifies originating numbers with poor ALOC/ASR and automatically places blocks on those numbers. We also filter our traffic against SOMOS DNO and Fraud Central RoboGuard blacklists and block those calls.

Ongoing Robocall Mitigation

Alliance monitors and examines call detail records (CDRs) on a repeating basis to detect suspicious call activity and/or calling patterns. When we detect network usage patterns consistent with illegal robocalls or suspect illegal robocalling is taking place, we will immediately seek to identify the party that is originating, terminating, or routing these calls so that we may take appropriate action. The actions taken may include, 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 corporate and/or d/b/a name; block the party's ability to originate, terminate, or route calls on the network; and/or providing notice to law enforcement authorities.

Alliance's contractual agreements with subscribers / customers allow Alliance to block adverse - suspected illegal traffic immediately. Subscriber / Customer will be notified. If the traffic is not cured, services can and will be permanently terminated depending on the outcome of the investigation. All existing and new subscribers / customers are verified to be listed in the RMD and we conduct periodic checks to ensure that existing subscribers / customers have maintained their listings.

As part of our Plan to mitigate and prevent any originating robocalls, we are committed to early identification and investigation of possible robocalling conditions. Among other things, we watch for higher-than-normal subscriber traffic volume, including large bursts of traffic in small timeframes or spikes in usage. We also monitor for originating calls of short duration and low call completion percentages, originating calls with sequential called to number dialing patterns.

Alliance 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:

Rob Peterson, Network Operations
606 Post Rd E., Suite 710, Westport, CT 06880
203-349-4128
robp@alliancegrp.com