



Robocall Mitigation Program

Pursuant to 47 C.F.R. § 64.6305, Automation Concepts Company and its applicable subsidiaries with FCC Registration Numbers ("FRNs") (collectively, "ACC") hereby submits its Robocall Mitigation Program ("RMP") that reflects ACC's practices and procedures to prevent and mitigate illegal robocalls. Pursuant to FCC Rule 64.6304(d), 47 C.F.R. § 64.6304(d), ACC is eligible for the extension of implementing STIR/SHAKEN in the non-IP portions of its network. ACC's RMP provided below describes the specific policy and procedures that ACC has implemented to detect and prevent illegal robocalls on its network.

ACC periodically evaluates the risks it faces, the effectiveness of these policies and procedures, and its capabilities to support the measures described. Should ACC determine that changes or revisions are appropriate, its practices may differ, evolve, and be revised from those described below. In submitting this RMP, ACC reserves the right to modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time in order to respond to changes in its business, its capabilities and its needs.

Commitment:

ACC has taken extensive efforts and is committed to stopping illegal robocallers from routing illegal robocalls calls over ACC's network.

Voice services and subscribers:

ACC offers, among other things, Voice over Internet Protocol ("VoIP") services to retail end user customers. ACC offers hosted PBX services to its retail end user customers. For ACC's hosted PBX services, ACC assigns the end user customer's service name and number for the caller ID and CNAM ("CallerName"), which end user customers cannot independently change. ACC is not an intermediate provider.

Subscriber Vetting:

When signing up new end user customers that will receive retail voice services from ACC over its network, ACC sufficiently vets such customers. For instance, as part of the vetting process, ACC collects information such as physical location, contact person(s), and for businesses, the nature of the customer's business, among other things. Doing so is necessary to provide a prompt response to traceback requests and enforcement efforts.

Telephone Number Validation:

When ACC establishes service to a retail end user voice customer, ACC confirms the end user customer has a verified association with the telephone numbers it uses for its originating telephone calls.

Acceptable Use Policy:

ACC requires that its customers comply with its Acceptable Use Policy ("AUP"). Under the AUP, ACC may suspend or terminate the services that ACC provisions to a customer (or anyone that uses ACC's services that are provided to a customer) if such customer violates ACC's AUP. In most cases, ACC will endeavor to notify the customer of such violations before taking any action, but ACC may act without such notice and without liability to prevent harm or damage to ACC's, customer's



or a third party's property, networks or systems. Customers also are required to agree that ACC may amend its AUP from time to time without notice, and that the customer is responsible for compliance with the then current version of the AUP.

Network Monitoring:

ACC has implemented a Fraud and Robocall Monitoring process for analyzing outbound Call Detail Records ("CDRs") looking for several fraud and robocalling patterns. If this process identifies robocalling patterns, it will alert ACC's Robocall mitigation team. The team will review the calls identified as potential robocalls and contact the responsible customers, as applicable. ACC will work with customers to determine the nature of the suspected robocalls. If the calls are determined to be illegal robocalls, ACC's service to the customer will be suspended or terminated.

Responding to Traceback Requests:

ACC is committed to fully and timely responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and will continue to cooperate with such entities in investigating and stopping illegal robocallers that use ACC's services to originate robocalls.