

Robocall Mitigation Plan for Aancall LLC (Non-Confidential Version)

1. Company Overview

Aancall LLC is a VoIP service provider offering voice communication services to customers globally, with a focus on U.S.-terminated calls.

We partner with:

- White-Label Platform Provider: Skyswitch (STIR/SHAKEN-compliant VoIP platform).

2. STIR/SHAKEN Compliance

Aancall LLC ensures all U.S.-bound calls are authenticated using STIR/SHAKEN protocols as follows:

Implementation:

- Skyswitch provides a fully STIR/SHAKEN-compliant VoIP platform that authenticates caller ID information and signs calls with the highest level of attestation available.

Caller ID Validation:

- Customers must provide valid caller ID information that matches their registered business identity.
- Spoofing of unauthorized numbers is strictly prohibited.

3. Robocall Mitigation Practices

Aancall LLC employs a multi-layered strategy to prevent illegal robocalls, including customer vetting, real-time monitoring, blocking mechanisms, and cooperation with enforcement agencies.

a. Customer Vetting (Know Your Customer – KYC)

- Require business registration documents or valid identification from all customers.
- Interview all new customers about their business practices.
- Verify customers through a combination of electronic/manual checks and references.
- Limit capabilities of new accounts until verification is complete.
- Reject high-risk customers, including telemarketers who fail to provide TCPA consent documentation.
- All customers must agree to our Acceptable Use Policy (AUP) prohibiting illegal robocalls, caller ID spoofing, and fraudulent or deceptive activity.

b. Traffic Monitoring & Enforcement

- Use analytics tools to monitor call patterns (e.g., short-duration calls, unusual volumes, spikes).
- Automatically flag suspicious traffic for manual review and intervention.
- Suspend accounts violating the AUP.
- Block originating numbers, terminating numbers, trunks, or entire accounts when necessary to prevent robocall activity.

c. Robocall Prevention Tools

- Nomorobo Integration: Leverages Skyswitch's partnership with Nomorobo to intercept and filter suspected robocalls before connection.

d. Recordkeeping & Cooperation

- Retain comprehensive Call Detail Records (CDRs) for at least two (2) years to support traceback investigations and FCC audits.
- Fully cooperate with the FCC, law enforcement, and the USTelecom Industry Traceback Group (ITG).
- Commit to responding to all traceback requests within 24 hours.
- When notified by the FCC Enforcement Bureau of illegal traffic:
- Block and report the identified traffic and any substantially similar traffic on an ongoing basis.
- If we determine the traffic is not illegal, provide the FCC with a written explanation of the investigation and conclusion.

4. Compliance Commitments

- STIR/SHAKEN: Fully implemented for all U.S.-bound calls through our partnership with Skyswitch.
- FCC Rules: We adhere to the TRACED Act, the Telephone Consumer Protection Act (TCPA), and all FCC robocall mitigation requirements.
- Enforcement Cooperation: We reserve the right to refuse or block traffic from any party engaged in robocalling, spoofing, or other violations.
- Annual Review: This plan will be reviewed and updated annually to reflect changes in regulations or technology.

5. Compliance Officer

Aancall LLC maintains a designated compliance officer responsible for overseeing and implementing this plan.

Certification Statement

Aancall LLC certifies that this Robocall Mitigation Plan outlines the reasonable steps taken to prevent the origination of illegal robocalls on our network. We will maintain documentation to support compliance with the practices described herein and will cooperate fully with enforcement agencies as required.