

Robocall Mitigation Plan

ADVANCED ALTERNATIVE INFORMATION SERVICES TECHNOLOGY, LLC

Certification of Compliance with the TRACED Act & FCC Robocall Mitigation Rules

ADVANCED ALTERNATIVE INFORMATION SERVICES TECHNOLOGY, LLC, certifies that it has implemented and maintains a **Robocall Mitigation Program** in compliance with **47 CFR § 64.6305**, ensuring all originating calls on its network adhere to FCC regulations.

Certification Statements

1. Implementation of Robocall Mitigation Measures

- ADVANCED ALTERNATIVE INFORMATION SERVICES TECHNOLOGY, LLC has established and enforces a **Robocall Mitigation Program** to prevent illegal robocalls and caller ID spoofing.

2. Regulatory Compliance & No Prior Violations

- Neither ADVANCED ALTERNATIVE INFORMATION SERVICES TECHNOLOGY, LLC nor any affiliates under its control have been:
 - Subject to **FCC, law enforcement, or regulatory actions** related to illegal robocalling or spoofing.
 - Found in violation of robocall mitigation certification requirements.

Robocall Mitigation Practices

1. Traceback Cooperation

- **Designated Point of Contact (POC)**
 - As required under **47 CFR § 64.6305(d)(4)(v)**, ADVANCED ALTERNATIVE INFORMATION SERVICES TECHNOLOGY, LLC maintains a **24/7 traceback contact** (name, title, address, phone, email) registered in the **FCC Robocall Mitigation Database**.
- **Response to Traceback Requests**
 - ADVANCED ALTERNATIVE INFORMATION SERVICES TECHNOLOGY, LLC commits to:

- Responding to **FCC, law enforcement, and traceback consortium requests within 24 hours.**
- Fully cooperating to **identify, investigate, and terminate** illegal robocallers using its network.

2. Subscriber Vetting & Identity Verification

- **Customer Due Diligence**
 - Residential, retail, and wholesale subscribers are verified using:
 - Service address confirmation.
 - Identity documentation.
- **Enhanced Screening for High-Risk Customers**
 - Outbound call centers & high-volume users undergo:
 - Stricter application reviews.
 - Ongoing monitoring for suspicious calling patterns.

3. Caller ID Authentication & Validation

- **Authorized Number Usage**
 - Subscribers may only use **numbers assigned by ADVANCED ALTERNATIVE INFORMATION SERVICES TECHNOLOGY, LLC or authorized partners.**
 - **Single-line subscribers:** Restricted to assigned numbers (TDM or IP).
 - **Multi-line (MLTS) subscribers:** All calls screened to ensure authorized number usage.
- **Caller ID Authentication**
 - ADVANCED ALTERNATIVE INFORMATION SERVICES TECHNOLOGY, LLC uses **third-party analytics** to detect and block illegal robocalls.
 - In **Iowa service areas, Aureon's Caller ID Authentication (CIDA) with Outbound Shield** is deployed to:
 - Block calls from spam-listed or invalid numbers.

4. Network Monitoring & Illegal Traffic Prevention

- **Real-Time Traffic Analysis**

- Anomalous calling patterns are flagged for investigation.
- High-volume traffic is scrutinized for robocall indicators.
- **Mitigation Actions**
 - Suspicious activity triggers:
 - Immediate investigation.
 - Termination of offending subscribers or carriers.

5. Know-Your-Customer (KYC) Policy for Carriers

- **Carrier Vetting**
 - All upstream providers must be **registered in the FCC Robocall Mitigation Database**.
 - Basic identification details collected include:
 - Business address, contact person(s), state of incorporation, and business nature.
- **Contractual Compliance**
 - All interconnection agreements include:
 - **Prohibited traffic clauses.**
 - **Traceback cooperation requirements.**