

Robocall Mitigation Plan

AEON COMMUNICATIONS INCORPORATED

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

AEON COMMUNICATIONS INCORPORATED certifies that it has implemented and maintains a **Robocall Mitigation Program** in accordance with **47 CFR § 64.6305**, ensuring all originating calls on its network comply with FCC regulations.

Certification Statements

1. Implementation of Robocall Mitigation Measures

- **AEON COMMUNICATIONS INCORPORATED** has established and enforces a **Robocall Mitigation Program** to prevent illegal robocalls, spoofing, and unlawful caller ID manipulation.

2. Regulatory Compliance & No Prior Violations

- Neither **AEON COMMUNICATIONS INCORPORATED** nor any of its affiliates have:
 - Been subject to **FCC enforcement actions, law enforcement penalties, or regulatory sanctions** related to illegal robocalling or spoofing.
 - Violated **FCC 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)**, **AEON COMMUNICATIONS INCORPORATED** maintains a **24/7 traceback contact** (name, title, address, phone, email) registered in the **FCC Robocall Mitigation Database**.
- **Response to Traceback Requests**
 - **AEON COMMUNICATIONS INCORPORATED** 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 through:
 - **Service address confirmation.**
 - **Valid 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 AEON COMMUNICATIONS INCORPORATED** 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**
 - **AEON COMMUNICATIONS INCORPORATED** employs **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.**