

# AccessOn Networks, Inc. dba AccessOn Internet Robocall Mitigation Plan

This Robocall Mitigation Plan is submitted by **AccessOn Networks, Inc. dba AccessOn Internet** (referred to hereafter as "AccessOn" or "the Provider") pursuant to the provisions of 47 C.F.R. § 64.6305, adopted by the Federal Communications Commission (FCC), which require all "voice service providers" to establish a "robocall mitigation plan."

This document sets forth the Provider's current policies and procedures designed to reduce or eliminate outbound illegal robocalls originating on its network and services. As an Internet Service Provider (ISP) that provides voice service utilizing an underlying interconnected VoIP platform, the Provider views these policies and procedures as constituting "reasonable steps" to avoid the origination of illegal robocalls by its customers.

In addition to following these steps, the Provider commits to responding to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG), and to cooperate with such entities in investigating and stopping any illegal robocallers that may use its service to originate calls.

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## I. STIR-SHAKEN IMPLEMENTATION STATUS

As indicated in the FCC's Robocall Mitigation Database, the Provider's status with respect to STIR-SHAKEN implementation is as follows:

- The Provider utilizes a third-party interconnected VoIP service provider, **Skyswitch**, to originate and terminate all voice calls.
- **AccessOn** does not directly implement or attest to STIR/SHAKEN. All voice calls originate on the **Skyswitch** platform, and they are responsible for their own STIR/SHAKEN implementation and attestation policies.
- **AccessOn** relies on the underlying mitigation and STIR/SHAKEN processes implemented by **Skyswitch** for calls traversing their platform. Calls originating through our service are subject to the policies and procedures set forth herein and the policies of our upstream provider, which are intended to prevent the origination of illegal robocalls.

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## II. TRACEBACK REQUESTS

As noted above, the Provider will cooperate with the FCC, law enforcement, and the ITG on all traceback requests and investigations. To allow for timely and comprehensive

response efforts, the Provider will dedicate sufficient resources to promptly complete and provide responses to all traceback requests received, and commits to fully responding to any traceback request received within **24 hours** after receiving the same.

Within **Appendix A** to this Plan, the Provider identifies a single point of contact for receiving all traceback requests.

As part of its efforts to assist in the successful traceback of illegal robocalls, the Provider will:

- Promptly identify the upstream provider (**Skyswitch**) used for the suspected illegal call.
- Promptly identify the **AccessOn Internet** customer of the service from which the call originated.

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### III. CUSTOMER VETTING PRACTICES

As a means of preventing or minimizing the origination of illegal robocalls through its voice services, the Provider will use best practices in vetting the identity of all its voice service subscribers. The subscriber vetting process is intended to help determine the legitimacy of a customer for the purpose of establishing a service relationship.

Generally, the Provider looks to confirm the identity of customers using its voice services through collecting information such as **physical customer location, contact person(s)**, and the **nature of the customer's business**.

Further, with respect to meeting existing obligations to take affirmative, effective measures to prevent new and renewing customers from originating illegal calls, the Provider:

- Utilizes **service agreements and acceptable use policies** as a means of preventing its new and existing subscribers from using their voice and broadband services in ways that would be in violation of local, state, or federal laws, or to engage in deceptive or fraudulent activity. These documents governing use of Provider provided services include terms indicating specifically to all customers that their services should not be used for the purpose of making illegal robocalls, and the Provider reserves authority within its service agreements to **suspend or terminate a subscriber's voice service** for violating applicable service-related terms.
- Relies on the **monitoring and mitigation processes** implemented by its underlying VoIP platform provider, **Skyswitch**, which includes routine analysis of calling patterns to facilitate early identification of unusual or suspicious calling activity. In those instances where **AccessOn Internet** identifies or is notified of activity or a pattern consistent with illegal robocalls, the customer will be

contacted immediately for further investigation and possible action regarding their subscribed voice service.

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## IV. TELEPHONE NUMBER VALIDATION PRACTICES

Telephone Number Validation refers to the confirmation of the customer or end-user right to use a telephone number in connection with their subscribed voice service(s).

- The Provider's underlying VoIP platform, **Skyswitch**, manages the assignment and validation of telephone numbers.
- A subscriber of **AccessOn Internet** is permitted to use a telephone number as their caller identity only if that number has been **directly provisioned and managed** through the **Skyswitch** platform via the Provider.
- **AccessOn Internet**'s customer premise equipment and the **Skyswitch** platform are configured to only permit originating calls using the telephone numbers officially assigned to the customer's account, thereby preventing unauthorized spoofing of unassigned numbers from originating on the network.

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## V. INTERNATIONAL CALL ORIGINATORS

The Provider is not currently an international voice services provider and does not actively market its services to international call originators using North American Numbering Plan resources. If at any time the Provider does sell its services to customers who are international call originators, it will familiarize itself with and develop best practices for fully vetting such customers and performing telephone number validation on all international originated calls.

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## VI. KNOW YOUR UPSTREAM PROVIDER PROCEDURES

The Provider relies entirely on **Skyswitch** as its underlying Voice over Internet Protocol (VoIP) platform for all voice service origination and termination.

- **AccessOn Internet** maintains a direct business relationship with **Skyswitch** and monitors their ongoing compliance with FCC rules, including their Robocall Mitigation Plan.
- The Provider will cooperate fully with **Skyswitch** in identifying and shutting down illegal traffic, and relies on the robocall prevention language and policies mandated by **Skyswitch** within their service agreements for the mutual benefit of protecting both networks.
- Included as part of **Appendix A** to this Robocall Mitigation Plan document is the name of the Provider's current, immediate "Upstream Provider" along with contact information for their traceback efforts.

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## VII. ONGOING ROBOCALL MITIGATION PRACTICES

The Provider relies heavily on the **real-time monitoring and mitigation capabilities** of the **Skyswitch** platform.

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## VIII. THIRD-PARTY ANALYTICS

The Provider utilizes the integrated analytics and mitigation services provided by the underlying VoIP platform to further assist in the prevention of illegal robocalls.

Included in **Appendix A** is the name of the upstream vendor that provides the voice platform. The Provider relies on the mitigation capabilities that are native to or integrated with the **Skyswitch** platform.

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# Appendix A

## Traceback Request Single Point of Contact (SPOC) for AccessOn Networks, Inc. dba AccessOn Internet:

| Field                 | Information                     |
|-----------------------|---------------------------------|
| <b>Name:</b>          | Jan Harris                      |
| <b>Title:</b>         | Site Manager                    |
| <b>Phone Number:</b>  | 252-210-4884                    |
| <b>Email Address:</b> | Jan.harris@accessoninternet.com |