

Robocall Mitigation Plan

Updated June 2026

American Heartland Fiber Networks, LLC (DBA: E-vergent and Edge Broadband) is a small voice service provider (VSP) dedicated to stopping illegal calls from originating in our network and monitoring the calls coming into our network. The FCC required that, by June 30, 2021, all VSPs certify in the Robocall Mitigation Database that they have (1) fully implemented STIR/SHAKEN across its entire network, (2) implemented STIR/SHAKEN on a portion of its network and that the remainder of the calls are subject to a Robocall Mitigation Plan (RMP), or (3) have not implemented STIR/SHAKEN but subject all calls to an RMP to ensure that the network is not originating illegal robocalls.

The FCC requires that VSPs develop an RMP that:

- Lists the specific, reasonable steps the VSP has taken to avoid originating illegal robocall traffic
- States a commitment to respond fully and in a timely manner to all traceback requests from the FCC, law enforcement, and the industry traceback consortium
- To cooperate with entities investigating and stopping any illegal robocallers that use their services to originate calls.

American Heartland Fiber Networks, LLC (DBA: E-vergent and Edge Broadband) purchases origination, termination, and hosted-switch access from Atheral LLC (FRN 0028070290) and BCM One Cloud Communications LLC (FRN 0032363418) who provide crucial elements of our RMP as part of their interconnected white-label VoIP wholesale services to American Heartland Fiber Networks, LLC (DBA: E-vergent and Edge Broadband).

Know Your Customer

We follow the caller ID authentication best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group.

(<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>).

This process includes the collection and review of entity-identifying information to confirm that we have an authenticated relationship with the customer. We use this authenticated information to determine whether the customer is subject to any enforcement actions that restrict the type of calls that they may make. For example, if they have been banned from initiating telemarketing calls.

We also validate, when possible, that the entity has a legitimate right to use its asserted calling numbers. We use this information to support the attestation level our white label wholesalers assign to calls that we originate for the customer.

Our contractual provisions with customers prohibit them from initiating illegal robocalls. If we find a customer initiating suspicious robocalls, within 24 hours we warn them to stop. If such action continues, then we will terminate the service to said customer.

International Subscribers

American Heartland Fiber Networks, LLC (DBA: E-vergent and Edge Broadband) does not sell

origination or termination services to subscribers outside of the United States.

Acceptable Use Policy

American Heartland Fiber Networks, LLC (DBA: E-vergent and Edge Broadband) maintains an Acceptable Use Policy (“AUP”) that subscribers must agree to before being permitted to use American Heartland Fiber Networks, LLC (DBA: E-vergent and Edge Broadband) broadband or voice services.

24 Hour Traceback Requests

American Heartland Fiber Networks, LLC (DBA: E-vergent and Edge Broadband) is committed to respond in a complete and timely manner to all traceback requests from the Federal Communications Commission, law enforcement, state attorneys general, Atheral LLC, BCM One Cloud Communications, LLC and the industry traceback consortium. Furthermore, American Heartland Fiber Networks, LLC (DBA: E-vergent and Edge Broadband) is committed to cooperating with such entities in investigating and stopping any illegal robocallers that use American Heartland Fiber Networks, LLC (DBA: E-vergent and Edge Broadband) service to originate calls. Subscribers are required to comply with traceback requests via our AUP. Traceback requests can be sent to **support@e-vergent.com** for immediate processing by American Heartland Fiber Networks, LLC (DBA: E-vergent and Edge Broadband).

Telephone Number Validation

If a subscriber wishes to use a telephone number (TN) as a caller identity and that TN is not directly managed by American Heartland Fiber Networks, LLC (DBA: E-vergent and Edge Broadband) or our wholesale partner Atheral LLC, or BCM One Cloud then TN validation is necessary by requiring the subscriber to provide a valid letter of authorization that they are an authorized user of such TN. Should the subscriber provide sufficient documentation to American Heartland Fiber Networks, LLC (DBA: E-vergent and Edge Broadband) of authorization to use a TN, documentation will be provided to Atheral LLC or BCM One Cloud so that they can attest calls originated with these TNs.

Investigation of High-Volume Network Traffic, Suspicious Calls, and Calling Patterns

For our traffic with wholesale VoIP provider, Atheral LLC, TransNexus’s ClearIP solution is deployed to monitor our origination voice traffic in real time to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts Atheral LLC if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. Atheral will immediately ask American Heartland Fiber Networks, LLC (DBA: E-vergent) to investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If American Heartland Fiber Networks, LLC (DBA: E-vergent) or Atheral LLC determine that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as based on our AUP.

Examples of calling patterns monitored

- Higher than expected cost generated by calls from a subscriber
- Targeted pumping of repeated calls to a specific called number within a 15-minute period
- Fast traffic pumping of repeated calls to a specific called geographic location within a

- 5-minute period
- Slow traffic pumping of repeated calls to a specific called geographic location within a 60-minute period
- Theft of service traffic pumping of repeated calls to high-cost geographic location within a 60-minute period
- Recent call volumes (last 60 min) vs weekly trends
- Number of unique destination numbers in a 60-minute time frame
- Irregularities in Short Call Duration (SDC) and Average Call Duration (ACD) distribution
- Anomalies in Answer-Seizure Ratio (ASR)
- Robocalling triggers monitoring for a high-volume of outbound calls or excessive incoming calls from the same calling number
- Wangiri trigger monitoring for origination calls to high termination rate destinations with short duration (to trigger end-users to call back) for all calls over a 5-minute duration
- Analysis of recent and past Call Detail Records (CDRs) to benchmark against expected trends

STIR/SHAKEN Implementation Timeline

Atheral LLC and BCM One Cloud Communications have implemented STIR/SHAKEN and comply with all regulations.

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Upstream Providers

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