

Robocall Mitigation Plan – AirWest/East Mobility, LLC

AirWest/East Mobility, LLC operates as a non-gateway intermediate provider / non-facilities-based voice service provider, reselling voice services and using the network infrastructure of upstream facilities-based carriers. Because we do not operate switching or call origination infrastructure, call authentication is implemented by our upstream providers where STIR/SHAKEN capabilities exist and are applicable to the type of traffic we resell.

To mitigate illegal robocalls and ensure responsible use of our services, we maintain the following robocall mitigation practices:

1. **Customer Vetting and Know-Your-Customer (KYC) Procedures**

We verify the identity of customers prior to activating voice services, including collecting business registration information, contact details, and reviewing the intended use of the service to prevent misuse.

2. **Acceptable Use Policies**

Our terms of service prohibit the use of our services for unlawful robocalling, caller ID spoofing, or other fraudulent telecommunications activity. Customers found violating these policies are subject to suspension or termination.

3. **Monitoring and Complaint Handling**

We monitor for suspicious calling behavior and investigate complaints related to robocalls or caller ID misuse. Suspicious activity may result in suspension or termination of service and is reported to the upstream provider.

4. **Upstream Network Controls**

Calls are transmitted over the infrastructure of our upstream carriers, which implement network-level robocall mitigation tools, analytics, and call authentication technologies such as STIR/SHAKEN where applicable.

5. **Traceback Cooperation and Record Retention**

We maintain accurate customer records for 3 years and respond promptly to traceback requests from upstream carriers, the Commission, or law enforcement. Accounts identified as originating unlawful calls are promptly suspended or terminated, and all actions are documented for compliance purposes.

Through these measures, AirWest/East Mobility, LLC works with upstream carrier partners to prevent the origination and transmission of illegal robocalls on our service.