

ROBOCALL MITIGATION PLAN (RMP) - ALPHA CONNECT JC LLC

Company: ALPHA CONNECT JC LLC

Effective Date: [04/09/2026]

I. Introduction and Statement of Principles

ALPHA CONNECT JC LLC is fully committed to consumer protection and the integrity of the telecommunications network. We have implemented a strict Robocall Mitigation Program designed to prevent, detect, and block illegal calling traffic, caller ID spoofing, and unauthorized automated telemarketing.

II. Network Architecture and Origination Control

Our telecommunications infrastructure is designed with security as a top priority:

Secure Platform: We utilize VitalPBX as our core routing and call management system, ensuring a controlled and auditable environment.

Encrypted Signaling: All voice traffic and SIP signaling are encrypted using industry-standard security protocols (TLS/SRTP) to prevent data manipulation or interception.

Origination Restriction: All traffic originating on our network comes exclusively from known, authenticated, and previously authorized extensions and endpoints. We do not accept traffic from unknown sources or unverified third-party networks.

III. "Know Your Customer" (KYC) Policy

To prevent malicious actors from accessing our network, we maintain a strict KYC policy for all new and existing customers:

Identity Verification: We require valid business documentation, identity verification of legal representatives, and physical and tax contact information before activating any services.

Use Case Evaluation: We comprehensively review the nature of the customer's business and their intended telecommunications use case.

Prohibition of Mass Traffic: Our Terms of Service explicitly prohibit the use of our network for unauthenticated broadcast traffic, illegal robocalls, unregulated predictive dialers, or automated telemarketing without prior express consent (strict TCPA compliance).

IV. Continuous Traffic Monitoring and Analysis

ALPHA CONNECT JC LLC actively monitors call patterns traversing our network to identify anomalies that suggest illegal activity:

Alert Metrics: We monitor traffic in real-time to detect unusually high call volumes and traffic

bursts (high Calls Per Second - CPS rates).

Duration Analysis: Our systems are configured to flag and audit accounts displaying patterns of short-duration traffic, a low Answer Seizure Ratio (ASR), or an abnormally low Average Length of Call (ALOC), which are classic indicators of robocalling campaigns.

Regular Audits: We conduct periodic reviews of Call Detail Records (CDRs) to ensure continuous compliance with our internal policies and federal regulations.

V. Response, Mitigation, and Traceback Protocol

If we detect suspicious activity or receive notifications from our upstream providers or regulatory agencies regarding illicit traffic:

Immediate Action: We will immediately suspend, block, or terminate any accounts or extensions found to be originating illegal traffic.

Traceback Cooperation: We are fully committed to cooperating with the FCC's Industry Traceback Group (ITG), the Traceback Consortium, and law enforcement agencies to identify the source of any suspicious call passing through our network within a 24-hour timeframe.

VI. STIR/SHAKEN Implementation Status

In compliance with current Federal Communications Commission (FCC) regulations:

Small Provider Extension: ALPHA CONNECT JC LLC certifies that it currently qualifies for the extension of the STIR/SHAKEN caller ID authentication framework implementation deadline applicable to small voice service providers, pursuant to 47 C.F.R. § 64.6304.

Mitigation Commitment: During this exemption period, we rely on this comprehensive robocall mitigation plan to ensure our network is not used to originate illegal calls. Simultaneously, we work closely with our upstream connectivity providers to ensure the proper signing and passage of STIR/SHAKEN attestations at the network level (Upstream Carrier Signing).

A handwritten signature in black ink, appearing to read 'Eduardo Pina', with a stylized, flowing script.

Eduardo Pina President And CEO ALPHA CONNECT JC LLC