

ALLNET AIR LLC.
ROBOCALL MITIGATION PLAN

ABOUT ALLNET AIR LLC

Allnet Air LLC. is a Limited Liability Company formed under the laws of Ohio and is a registered carrier with the FCC.

The Company holds the FRN/CORES ID Number of 0026336487 and the 499 Filer ID Number of 831969.

The Company is a Mobile Virtual Network Operator (MVNO) and provides single line cellular service to individual end user subscribers nationwide.

By nature of the Company's MVNO classification the Company relies on a third-party carrier's network in order to offer cellular service to end subscribers. The Company is an MVNO it has no real control over the facilities/network infrastructure necessary to implement any form of STIR/SHAKEN framework (since the Company does not own its infrastructure). The Company has no switches, owns no spectrum licenses, and has no rental or lease space on any Cellular towers.

Based on the nature of the service which the Company offers to individual cellular subscribers the risk for Robocalling, erroneous telemarketing, and other possible questionable activity is extremely low. Since the service is provisioned on a single cellular device, which in most cases is not compatible with auto dialers, or other tools that could generate High Volume Short Duration (HVSD) calling, the risk for any form of robocalling is inherently low.

In light of the low risk of illegal calls being originated the Company has tailored its Robocall Mitigation Program in light of the low risk of illegal robocalls being originated on its networks. The reasonable measures Company takes given the level of risk it faces are described in this plan.

The Company primary place of business is:

276 East Deerpath Road

Lake Forest, IL 60045

708.434.1120

General email address: CustomerService@Allnetair.com

Website: www.Allnetair.com

Company Leadership:

Head Administrative Officer

Peter Richer

276 East Deerpath Road

Lake Forest, IL 60045

Direct: 216.496.4929

Email Address: pricher@allnetair.com

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COO:

Name: Michael Richer
Street, 276 East Deerpath Road
Lake Forest, IL 60045
Direct Dial: 847.561.0269
Email Address: mricher@allnetair.com

Designated RMD Contact:

Name: Samantha Resch
276 East Deerpath Road
Lake Forest, IL 60045
Direct Dial: 847.624.8060
Email Address: samresch@allnetair.com

STIR/SHAKEN Implementation

The Company has no defined implementation related to STIR/SHAKEN and the parameters of call authentication framework. As an MVNO the Company is not able to implement STIR/SHAKEN in any manner. Since the Company lacks control over the facilities and network infrastructure necessary to implement STIR/SHAKEN, and the Company has no defined infrastructure the Company has no ability to assign its own calls.

Therefore, the Company is excluded from the FCC's STIR/SHAKEN implementation obligation pursuant to paragraph 40 of the FCC's First Call Authentication Report and Order. Alternatively, the Company relies on its underlying carrier partner(s), which own and maintain the network infrastructure, to implement and utilize STIR/SHAKEN authentication.

In relationship to the initial, and subsequent FCC Orders concerning STIR/SHAKEN and the Robocall Mitigation Database (RMD), the Company clearly serves as a voice service provider in the call chain and is without STIR/SHAKEN obligation.

ROBOCALL Mitigation Plan

As mentioned previously as an MVNO the company is at minimal risk for any to have any Robocalling take place since the Service the Company provides is of single line cellular subscriber use. However, the Company does have an established process in place to combat any risks it may face.

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KNOW YOUR CUSTOMER - SUBSCRIBER KYC & DUE DILIGENCE

The Company has only Post Paid only plans and no subscribers are offered any form of prepaid plan or “pay as you go”. Due to the nature of the Company business model and of the service plans, the individual subscriber enters into a contact term subscriber Agreement with the Company.

Upon establishing a relationship with the Company, the Subscriber must also agree to abide by all AT&T Terms and Conditions of Use, The Company Privacy Policy and also the Company Acceptable Use Policy.

The Company has the right to halt, suspend for an indefinite period of time and or terminate service to any subscriber who violates any of the AT&T governing documents.

Immediate suspension, or termination of a Subscriber by Company can be based on any violations of the AT&T covenants, among other things the unlawful use of Service by the Subscriber and/or any individual who may access or use a Subscribers device (of which the Subscriber is responsible) or any other policy which is governed by the Company.

PREVENTING ILLEGAL ROBOCALLS

As an MVNO that does not originate end user calls, Company is reliant upon its Upstream provider AT&T. All calls are routed through AT&T’s network upon origination, and the Company has no involvement in any kind related to provisioning.

The Company has reliance upon its main provider as AT&T with which it partners for service delivery and that partner then provides to Company tools, and analytics software for monitoring call traffic and to block relevant calls either on its own or at the request of the Company.

The Company utilizes a combination of internal tools and third-party solutions and analytics to check for Do Not Originate (DNO) numbers. In addition, the Company utilizes a combination of internal tools and third-party solutions to detect invalid phone number formats, area codes and unassigned number blocks and works very closely with AT&T.

UPSTREAM CARRIER/UNDERLYING PROVIDER

As mentioned throughout this Robocall Mitigation Plan Allnet Air LLC. is fully dependent upon the Company’s underlying carrier of which underlying carrier owns all facilities, infrastructure, network systems and cellular towers.

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AT&T PARTNER SOLUTIONS

2900 W. Plano Parkway, Floor 3

Plano, TX 75075

Main Phone Number:

General Email Address:

Website: ATT.com

TRACEBACK AND INQUIRY & RESPONSE

The Company commits to respond to all inquiries made by the FCC, law enforcement, the ITG and/or any other like or similar governing body within 24 hours of initial. The Company is committed to combating robocalling and other nefarious acts and violators of the TCPA therefore the Company shall always fully cooperate with these groups to investigate and stop any illegal activity and persons who try to commit such bad acts from using Company's service to carry or process illegal calls.

Upon notification by any Federal agency, any regulatory governing, the ITG, and/or any other like or similar agency or organization the Company will immediately contact its underlying provider and request to place a call block and also to report any identified possible or actual illegal traffic. And the Company will then deal with both the agency making the request/inquiry and the underlying provider to investigate any suspicious activity on an ongoing basis.

The Company will also have a Dedicated Point of Contact to deal with all inquiries from any law enforcement agency or ITG to deal with traceback requests.

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COMPANY DECLARATION

The Company is not currently subject to a formal Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing, nor has it been so in the past two years.

The Company has the right to update, modify and/or change this plan at any time which such changes made by the Company designated individual; when, and as the Company business model may change. Company shall immediately upload the new plan to the RMD.