

Pursuant to 47 C.F.R. § 64.6305, Aim Sun Telecom submits this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls. This report describes the status of its implementation of STIR/SHAKEN and the practices and procedures Aim Sun Telecom has in place to mitigate illegal robocalls as of January 25, 2022. Aim Sun Telecom may modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time in order to respond to changes in its business, its capabilities and its needs.

As of January 25, 2022, Aim Sun Telecom has a mix of CLI and Call Center traffic on its network. The current status of its STIR/SHAKEN implementation is:

- ☐ My traffic is fully attested.
- ☐ My traffic is partially attested.
- ☒ None of my traffic is attested yet

Aim Sun Telecom has fewer than 100,000 subscribers and is therefore eligible for the STIR/SHAKEN implementation exemption for small carriers under 47 CFR § 64.6304. The company requires this extension to complete the implementation of the STIR/SHAKEN technology. We are currently in the stage of testing STIR/SHAKEN technology with our vendors.

Aim Sun Telecom is judiciously working to prevent unlawful robocalls from originating on its network while in the process of installing the new STIR/SHAKEN authentication architecture. In the meantime, Aim Sun Telecom has implemented the following robocall mitigation plan to address unlawful robocall traffic:

Aim Sun Telecom has enforceable terms of use and/or an acceptable use policy noted in its contracts. These policies define the circumstances by which the company will deny, suspend, or terminate service to a customer. Prior to installing services for new customers, the company takes the following measures to weed out end users that could potentially generate robocall traffic:

The Company confirms the following information for its customers:

- Customer's identity
- Customer's right to use the telephone number presented on calls
- Service Address
- Credit History

When the customer is a business, Aim Sun Telecom also requires Business Incorporation Documents and verifies they have a reputation as a valid business that abides by the law.

Aim Sun Telecom has established methods and procedures to monitor its network and detect / prevent fraudulent activity. The company uses call authentication, call labeling, and call blocking services to protect its networks and consumers from harmful calls. It also uses software to monitor its network's daily usage and has established methods and procedures in place to address issues as soon as they are identified.

Aim Sun Telecom will comply fully with all conditions set forth in the FCC'S 2020 Report and Order mandating the implementation of the STIR/SHAKEN framework, as well as with the Commission's rules and policies more generally.

Aim Sun Telecom will provide valid law enforcement and regulatory agencies with the relevant non proprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities and implement mandated robocall mitigation

procedures to the fullest extent possible with the goal of maximizing the mitigation of illegal robocalls.