

AURONEX COMMUNICATIONS LLC

ROBOCALL MITIGATION PLAN

2026

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Authorized Representative: Nolan Prescott

Designation: Chief Operating Officer

Date: August 14, 2026

1. COMPANY OVERVIEW

AURONEX COMMUNICATIONS LLC operates in the wholesale telecommunications sector, providing voice termination, carrier interconnection, and related telecommunications services to domestic and international customers.

The company facilitates the transmission and delivery of voice traffic for authorized business customers. AURONEX COMMUNICATIONS LLC does not knowingly originate, facilitate, or support unlawful robocalling activities, fraudulent communications, or unauthorized caller identification practices.

The company recognizes its responsibilities under applicable Federal Communications Commission (FCC) regulations and industry-established robocall mitigation standards.

To support these obligations, AURONEX COMMUNICATIONS LLC maintains operational safeguards, customer verification requirements, and traffic oversight procedures intended to identify, prevent, and address potentially unlawful telecommunications activity.

2. PURPOSE AND SCOPE OF THE ROBOCALL MITIGATION PROGRAM

The robocall mitigation framework established by AURONEX COMMUNICATIONS LLC is intended to reduce the risk of illegal robocalls being introduced into or transmitted through its telecommunications network.

The program establishes operational and administrative measures designed to:

- Identify and prevent potentially unlawful or fraudulent voice traffic.
- Evaluate network activity for irregular calling patterns.
- Verify customer identities and assess compliance obligations.
- Facilitate timely investigation and resolution of traceback inquiries.
- Maintain responsible interconnection practices with upstream and downstream telecommunications providers.

AURONEX COMMUNICATIONS LLC maintains a strict policy against knowingly facilitating fraudulent, deceptive, or otherwise unlawful calling activities.

3. CUSTOMER DUE DILIGENCE AND ONBOARDING REQUIREMENTS

Before establishing telecommunications services, AURONEX COMMUNICATIONS LLC conducts customer identification and verification procedures designed to assess the legitimacy of prospective business relationships.

As part of the onboarding process, customers are required to provide relevant documentation and business information, which may include:

- Official business registration and incorporation records.
- FCC Registration Number (FRN), where applicable.
- FCC Form 499 Filer ID, where required.
- Company ownership information and authorized contact details.
- A description of anticipated telecommunications traffic and intended service usage.

- An operational business website and company-associated email address.
- Relevant financial or payment verification documentation.
- Confirmation of compliance with applicable FCC regulations and Telephone Consumer Protection Act (TCPA) requirements.

AURONEX COMMUNICATIONS LLC reserves the right to decline or discontinue service when customer information cannot be adequately verified or when material compliance concerns remain unresolved.

Contractual Customer Obligations

Customers must enter into service agreements containing restrictions against prohibited telecommunications practices.

Such restrictions include:

- Unauthorized manipulation or falsification of caller identification information.
- Improper re-origination or misrepresentation of telecommunications traffic.
- Transmission of fraudulent or illegal robocalls.
- Concealment or masking of traffic origin.
- Violations of applicable federal or state telecommunications requirements.
- Attempts to circumvent legitimate routing controls or regulatory safeguards.

Noncompliance with these contractual obligations may result in immediate restriction, suspension, or termination of telecommunications services.

4. NETWORK SURVEILLANCE AND TRAFFIC MANAGEMENT

AURONEX COMMUNICATIONS LLC employs network monitoring procedures intended to identify traffic characteristics that may indicate abusive, suspicious, or potentially unlawful calling activity.

Traffic evaluation includes analysis of:

- Calling volumes and unusual traffic fluctuations.
- Answer Seizure Ratio (ASR) and Average Call Duration (ACD).
- Patterns involving unusually short call durations.
- Calling activity directed toward destinations presenting elevated risk.
- Customer-specific calling behavior and changes in established traffic patterns.

The company's Network Operations personnel are responsible for reviewing relevant traffic indicators and investigating activity that may warrant additional scrutiny.

Response to Suspicious Traffic

When potentially problematic traffic is identified, AURONEX COMMUNICATIONS LLC may initiate appropriate protective measures, including:

1. Blocking or restricting the affected traffic.

2. Contacting the responsible customer for clarification.
3. Initiating an internal investigation.
4. Temporarily suspending services while concerns are evaluated.

Customers responsible for repeated violations may be permanently disconnected from the network.

5. TRACEBACK COOPERATION AND COMPLAINT MANAGEMENT

AURONEX COMMUNICATIONS LLC recognizes the importance of industry cooperation in identifying and mitigating unlawful robocall activity.

The company is committed to cooperating with authorized traceback investigations and legitimate requests received from:

- The Federal Communications Commission.
- The Industry Traceback Group (ITG).
- Appropriate law enforcement authorities.
- Interconnected upstream and downstream telecommunications providers.

Investigation and Response Procedures

Upon receiving a traceback notification or a complaint concerning potentially unlawful telecommunications traffic, the company follows an investigative process that includes:

1. Examining available call detail records and associated network information.
2. Identifying and contacting the customer associated with the reported traffic.
3. Restricting or discontinuing suspicious traffic when circumstances warrant.
4. Requiring appropriate corrective measures to address identified compliance concerns.

Failure by a customer to cooperate with an investigation or implement required corrective actions may result in service disconnection.

6. STIR/SHAKEN AUTHENTICATION AND ROBOCALL MITIGATION

AURONEX COMMUNICATIONS LLC acknowledges the importance of the STIR/SHAKEN caller identification authentication framework and applicable FCC requirements governing voice traffic authentication.

The company incorporates the following principles into its robocall mitigation approach:

- Customers are expected to comply with applicable caller identification authentication requirements.
- Voice traffic that lacks authentication remains subject to applicable robocall mitigation controls.
- Customers must observe relevant regulatory obligations concerning authentication and lawful traffic transmission.

AURONEX COMMUNICATIONS LLC maintains a robocall mitigation program intended to prevent illegal telecommunications traffic from originating on its network.

The company recognizes that caller identification authentication and operational traffic monitoring serve complementary functions in supporting network integrity.

7. INTERNAL COMPLIANCE GOVERNANCE

AURONEX COMMUNICATIONS LLC maintains internal procedures intended to support consistent implementation of its robocall mitigation responsibilities.

These procedures address:

- Customer identity verification and due diligence.
- Network traffic monitoring and evaluation.
- Investigation and handling of customer complaints.
- Internal escalation of suspected violations.
- Authorization to restrict, suspend, or terminate services.

Personnel involved in network operations and customer relationship management receive guidance concerning the identification of suspicious telecommunications activity and the enforcement of company policies.

The company emphasizes timely internal communication and appropriate corrective action when potential violations are identified.

8. REGULATORY COMPLIANCE AND CONTINUOUS IMPROVEMENT

AURONEX COMMUNICATIONS LLC is committed to conducting its telecommunications operations in accordance with applicable federal and state regulatory requirements.

The company recognizes that effective robocall mitigation requires ongoing attention to emerging threats, regulatory developments, and evolving industry practices.

Accordingly, AURONEX COMMUNICATIONS LLC will review and update its internal mitigation procedures when necessary to maintain alignment with applicable FCC requirements and relevant industry standards.

The company further commits to cooperating with legitimate traceback investigations, responding to regulatory inquiries, and taking appropriate action to prevent unlawful robocalling activity.

Through customer accountability, network oversight, and cooperation with industry stakeholders, AURONEX COMMUNICATIONS LLC seeks to maintain a responsible and compliant telecommunications operating environment.

AUTHORIZED REPRESENTATIVE

Company: AURONEX COMMUNICATIONS LLC

Name: Nolan Prescott

Title: Chief Operating Officer

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