ROBOCALL MITIGATION PROGRAM DESCRIPTION

Filer: ACS Install, LLC

FRN: 0039130364

Date of execution: November 10, 2026

1. Overview

ACS Install, LLC (“ACS”) is a small hosted-voice provider. We serve named business and residential end-user customers on our private PBX. We do not operate as a wholesale SIP gateway, do not sell origination to downstream carriers, and do not transit other providers’ traffic.

Outbound public-network calls are handed to an underlying carrier (currently wireless GSM for ordinary outbound; 911/933 via BulkVS). ACS has not implemented the STIR/SHAKEN authentication framework on any portion of its network and does not own or attach a SHAKEN certificate to SIP INVITEs (47 C.F.R. § 64.6304). ACS still maintains this robocall mitigation program and will cooperate with traceback as required by 47 C.F.R. § 64.6305.

2. Know-your-customer (KYC)

Before voice service is provisioned, ACS collects:

• Customer legal name and service (civic) address for the location

• Login email and telephone contact

• Government-issued photo ID (driver license, state ID, or passport), front and back, captured in the ACS customer portal (ACS-ID-KYC)

• Signed service order / acceptable-use terms stating the service is for lawful voice only

ACS does not collect Social Security Numbers for standard hosted voice. ACS does not onboard “downstream providers.” Each customer receives named PBX extensions tied to that account. Resale, robocall blasting, and SMS blasting are prohibited.

3. How calls are originated on our network

Customers place calls from ACS-issued extensions (desk phones or the ACS phone app) registered to ACS’s PBX. ACS can identify the customer account and extension that originated a call. We do not accept unauthenticated public SIP from the internet for origination.

4. Monitoring and enforcement

ACS reviews complaints, unusual usage, and any traceback notice against the customer account and extension. If ACS determines a customer originated illegal robocalls, spoofed caller ID in violation of law, or used the service for prohibited blasting or resale, ACS will suspend or terminate the service and, where required, report or cooperate with the FCC, law enforcement, and the Industry Traceback Group.

ACS does not claim a third-party robocall analytics platform or automated CCR scoring. Mitigation is account-based: known customer, known extension, photo ID on file, and the ability to shut the line off.

5. Traceback

ACS will respond to official traceback requests from the Industry Traceback Group (ITG), the FCC, and law enforcement within 24 hours of receipt. ACS will identify the originating customer and extension for calls placed on its PBX and will not ignore or delay lawful traceback.

Traceback contact: support@acsinstall.com
ACS Install, LLC — Carlos Abrego, CEO

6. STIR/SHAKEN

ACS has not implemented STIR/SHAKEN authentication on its PBX. Outbound PSTN is completed by the underlying carrier. ACS will not represent that it signs or attests outbound INVITEs with its own certificate.

7. Declaration

I declare under penalty of perjury under the laws of the United States of America that the foregoing program description is true, accurate, and correct to the best of my knowledge.

Executed on: November 10, 2026

By: Carlos Abrego

Title: CEO

ACS Install, LLC