

Acclaim Telecom Services, Inc. Robocall Mitigation Plan

| Date | Company | Change Summary |
|-------------------|--------------------------|-----------------|
| October 4, 2021 | Acclaim Telecom Services | Initial Release |
| June 22, 2023 | Acclaim Telecom Services | Revision 1 |
| December 10, 2024 | Acclaim Telecom Services | Revision 2 |

Introduction

This Robocall Mitigation Plan is submitted by Acclaim Telecom Services, Inc. pursuant to the provisions of 47 C.F.R. § 64.6305, adopted by the Federal Communications Commission (FCC) which require all “voice service providers” to establish a “robocall mitigation plan”. This document sets forth the Acclaim Telecom’s current policies and procedures designed to minimize or eliminate the possibility of outbound illegal robocalls originating on its network. Acclaim Telecom views these policies and procedures as constituting “reasonable steps” to avoid the origination of illegal robocalls on its network. In addition to following these steps, Acclaim Telecom commits to responding to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG), and to cooperate with such entities in investigating and stopping any illegal robot callers that may use its service to originate calls.

Stir/Shaken Implementation

Acclaim Telecom has not implemented the STIR/SHAKEN authentication framework on any portion of its network and all calls originating on its network are subject to the policies and procedures set forth in this Robocall Mitigation Plan which are intended to stop anyone from using the Acclaim Telecom’s service to originate illegal robocalls. However, Acclaim Telecom’s upstream provider signs all calls received from our network and calls are sent in compliance with STIR/SHAKEN.

Acclaim Telecom uses a major VOIP carrier to process all outbound calls which in turn signs the calls as part of its service to Acclaim Telecom. Acclaim Telecom is not a CLEC but a service provider and reseller of the VOIP carrier’s products. Acclaim Telecom’s mitigation policies coupled with its chosen carrier greatly minimizes or totally eliminates possible illegal robocall activity on its network.

Steps taken by our VOIP Carrier.

- Outbound IP-based calls from Acclaim Telecom to the carrier using U.S. phone numbers in their account are signed with “A” or full attestation
- Outbound IP-based calls from Acclaim Telecom to the carrier using phone numbers that are not in their account are signed with “B” or partial attestation
- Acclaim Telecom does not perform any international calls and does not use “C” or gateway attestation; however, our carrier does perform this service for customers requiring it
- Carrier does not place outbound calls from any customer, Including Acclaim Telecom, that does not have a registered Robocall Mitigation Plan on file

Additional steps taken by Acclaim Telecom Services.

- Acclaim Telecom fully vets all customers that will be using any outbound services. This includes ensuring the phone number being used is not listed as a SPAM number and belongs to the customer requesting the service

- All potential outbound numbers are listed in a database and any attempt to place an outbound call campaign with any number not in the database (or blacklisted) will be denied
- Acclaim Telecom prohibits outbound marketing campaigns for all customers and will discontinue services if such campaigns are discovered, even if the originating number is not flagged as SPAM
- Acclaim Telecom will promptly disable customers from placing outbound robocalls that are in violation of the policies set forth.
- Acclaim Telecom does not provide political messaging, polling, or any calls to the general public that have not been vetted as business use only

Customer Vetting Practices

As a means of preventing or minimizing the origination of illegal robocalls through its outbound voice services, Acclaim Telecom will use best practices in vetting the identity of all of its voice service subscribers. The subscriber vetting process is intended to help determine the legitimacy of a customer for the purpose of establishing a service relationship. Generally, Acclaim Telecom looks to confirm the identify of customers using its outbound voice services through collecting information such as physical customer location, contact person(s), state of incorporation, federal tax ID, and the nature of the customer's business. Acclaim Telecom will size any potential customer request(s) before provisioning any services for use. This includes number of phone numbers, potential uses, service agreements and rights to use telephony services requested. Acclaim Telecom will also add robocall mitigation language to any agreements in which the potential customer seeks the use of outbound calling campaigns.

Telephone Number Validation Practices

With respect to meeting existing obligations and to take affirmative, effective measures to prevent customers from originating illegal calls, Acclaim Telecom has implemented the following practices

- Acclaim Telecom's business model is to provide outbound notifications for business entities only
- Acclaim Telecom onboards potential customers that have a legitimate business reason for using an outbound call service provider
- Legitimate business use scenarios are, but not limited to: notifications to employees, tenants, or residents of work status, inclement weather days. Notice of parking access or restrictions, services being provided such as air conditioner repair, power outages, package delivery, or any messages that are intended to inform recipients of important notices
- Acclaim does not allow residential subscribers to use outbound calling
- No marketing, advertising, polling, religious, or political messages are allowed

Outbound Call Queuing

Acclaim Telecom does not allow customer subscribers to place outbound robocall campaigns until after the potential customer vetting process. After this process, a subscriber is assigned the following:

- A customer Id
- A client id. The customer will be assigned a client id
- Multiple client ids will be assigned if the customer has additional clients using the service such as a messaging service provider
- A username/password for logging on to the voice network
- A token to be used in the secured API call

Only requests received from the subscriber via a secured API call using the customer token and login credentials are processed. Using a secure API and token verification process to queue outbound calls greatly minimizes or eliminates possibilities of illegal robocall calls or campaigns.

In addition to the above call queuing practices, Acclaim Telecom verifies the originating number is owned by the queueing entity, the entity has not been blacklisted from using the service, the destination number recipient has not opted out from allowing the queueing entity to call them, and the destination number is a valid North American Numbering Plan NPA-NXX. If any of these restrictions are met, the call is not queued and an API error message indicating the reason for the denial is returned to the queueing entity.

All outbound calls placed by this method are archived and timestamped with the following Call Analytics detailed below.

Call Analytics

Acclaim Telecom maintains call details for all outbound campaign calls for a minimum period of two years. These details include but are not limited to the following.

- Call volume
- Call duration
- Start time and End time of campaign
- Origination phone number sorted by subscriber
- Content of the delivery message for further review (in written text)
- All call destinations for the specific campaign
- Only US based calls are allowed to be queued

History of Enforcement Actions

As of the date of this Revision, Acclaim Telecom has not performed any Enforcement actions. There have not been any observed or reported violations to require it. If any actions are required in the future, Acclaim Telecom will update this document and detail the steps taken.

International Call Origination

Acclaim Telecom is not currently an international voice services provider. In fact, Acclaim Telecom does not allow any international outbound call traffic whatsoever. If at any time Acclaim Telecom does decide to sell services to customers which are international call originators using North American Numbering Plan resources, Acclaim Telecom will familiarize itself with and develop best practices for vetting such customers and performing telephone number validation on all international originated calls.

Traceback Requests

Acclaim will actively cooperate with the FCC, law enforcement and The Industry Traceback Group (ITG) to investigate and stop illegal robocalls. Acclaim Telecom will dedicate sufficient resources to provide prompt (within 24 hours) and complete responses to traceback requests.

As part of its efforts to assist in the successful traceback of illegal robocalls, Acclaim Telecom will include within its carrier interconnection and/or service agreements language requiring traceback cooperation on any voice service calls exchanged.

Know Your Upstream Provider Procedures

Acclaim Telecom has a longstanding relationship with its upstream provider and maintains awareness of the nature of their businesses and the legitimacy of their call transmission services. Acclaim Telecom has

chosen an upstream provider with a proven track record of robocall mitigation and monitoring. Further, Acclaim Telecom, in the interest of providing the highest quality services to all of its voice service customers, is committed to taking those steps necessary to ensure that Acclaim Telecom's upstream provider is equally committed to eliminate illegal robocalls. This includes the use of robocall prevention language in any contracts that Acclaim Telecom may directly have with its upstream provider.

Acclaim Telecom's upstream provider signs all calls received from our network and calls are sent in compliance with STIR/SHAKEN.

Acclaim Telecom may establish a relationship with additional upstream provider(s) in the future at which time all articles contained in this RMD will be fully implemented in the new relationship.

Ongoing Robocall Mitigation Practices

Acclaim Telecom monitors the usage of its network and examines call detail records (CDRs) on a recurring basis for the purpose of detecting suspicious call activity and/or calling patterns. If network usage patterns consistent with illegal robocalls are detected or Acclaim Telecom otherwise suspects illegal robocalling is taking place on its network, Acclaim Telecom will immediately seek to identify the party that is queuing these calls so that it may take appropriate action. The actions taken may include, but are not limited to: initiating a traceback investigation; verifying that the originating customer owns or is authorized to use the Caller ID number; determining whether the Caller ID name sent to a receiving party matches the customer's corporate name, trademark, or d/b/a name; terminating the party's ability to originate, terminate, or route calls on Acclaim Telecom's network; and providing notice to law enforcement authorities.

As part of its Plan to mitigate and prevent any originating illegal robocalls on its network, Acclaim Telecom is committed to early identification and investigation of possible robocalling situations. In monitoring usage of its network, particular attention is given to: higher than normal subscriber traffic volume including large bursts of traffic in small timeframes or inconsistent volumes of traffic (spikes in usage); originating calls of short duration and low call completion percentages; originating calls with sequential called to number dialing patterns; and calls to NPA-NXXs not assigned by the North American Numbering Plan Administrator.

Traceback Request Single Point of Contact

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