

Prohibition against the Use of Service for Illegal Robocalling

Definition

Illegal Robocalls are calls generated by autodialers for commercial purposes without the permission of the called party. These calls may be from a recorded voice or be auto transferred to a live agent; they will often appear from a disguised number; and they will either claim a pre-existing business relationship (“car warranty” or “Microsoft refund”) or disguise their commercial intent with false claims of fraudulent activity (“IRS notice” or “Amazon account hack”).

Robocalls for non-commercial reasons (school closings, political notices, for example) or for commercial reasons with the telephone owner’s prior consent (utility bill payment or appointment reminders, for example) are legal and permitted.

Screening of Use of Service – New Orders

To mitigate illegal robocalling, we will screen new service requests:

- We will not deploy large volume calling capability as a residential service or at an address shown in the company records as being residential
- Business requesting large volume calling capability must provide a tax ID and verification as to the nature of the business
- We verify addresses to look for overlapping / multiple deployed voice path subscriptions
- A company representative may visit the premise of the business to verify the number of users at the location is appropriate for the volume of calling paths requested

Screening of Use of Service – Existing Customers

We will monitor usage of our network to look for flags that suggest illegal robocalling is occurring and investigate as warranted. If notified by a third party that suspected illegal robocalling is occurring within our network, will investigate such complaints. Any such investigations will be at our sole discretion.

During the course of investigating any such complaints we may be required to review your calling patterns and release information about your calls or your service to third parties as required and permitted by law.

Investigation and Resolution of Illegal Robocalling

We are permitted but not required to investigate any claims of illegal robocalling in whatever manner we believe is appropriate based on the nature of the claim. Such investigation may include contacting the alleged robocaller to review and resolve, if possible, the complaint. If we are unable to resolve the complaint or you fail to respond to us, we may suspend or terminate your service with or without advanced notice. AT OUR SOLE DISCRETION, WE MAY CHOOSE TO REFUSE SERVICES THAT WE BELIEVE MAY BE USED FOR ILLEGAL ROBOCALLING.