

IN THE CIRCUIT COURT OF
COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

FILED
9/27/2021 4:25 PM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2021L007947

14980979

**National Association of Professional Allstate
Agents, Inc.**, an association, *et al.*,

Plaintiffs,

v.

Allstate Insurance Company,

Defendant.

Civil Case No. 2021L007947

Plaintiff's Amended Motion for Entry of Preliminary Injunction

Plaintiff National Association of Professional Allstate Agents (“NAPAA”), by James Bopp, Jr., its undersigned counsel of record, files this Motion for Entry of Preliminary Injunction, pursuant to Illinois Code of Civil Procedure. 735 ILCS 5/11-102. NAPAA moves this Court to enjoin Defendant Allstate Insurance Company (“Allstate”) from requiring Allstate Exclusive Agency Owners (“EA(s)”) use Allstate Agency Voice (“AAV”) as the sole means of telephonic communication in each EA’s agency. In support of its motion, Plaintiff submits a separate Memorandum of Law and states the following:

1. This case concerns Allstate’s breach of the express terms of the EA Agreement by requiring all EAs to use only Allstate supplied and maintained AAV. Plaintiff seeks immediate injunctive relief from this breach, and from Allstate’s attempt to strip EAs of this particular and outlined area of autonomy guaranteed by the EA Agreement. The express terms of the EA Agreement specifically state that the EAs are required to “supply and maintain” their own telephone systems.

2. In 2020, Allstate announced its implementation of AAV, a centralized telephone system. AAV is a Voice Over Internet Protocol (“VOIP”) system, to be used by all EAs for *all* telephone communications in each EA’s agency. Allstate has mandated that all EAs implement and use AAV, with the system rolling out over the course of 2021, and full implementation achieved by 2022. Allstate requires all EAs to pay Allstate for the costs of running AAV in their agency, amounting to system implementation costs, as well as an ongoing monthly charge of \$23 per line, which is deducted by Allstate directly from the EA’s commissions. For the reasons set forth in Plaintiff’s Memorandum of Law, Plaintiff has met the requirements for a preliminary injunction against implementation of AAV.

4. First, Plaintiff NAPAA and its EA members have a clearly ascertained right in need of protection. The EA Agreement itself identifies this right when it states that EAs must “supply and maintain” their own telephone systems. At the time this provision was agreed to it conferred benefits to all parties involved; not only to Allstate, but to the EAs themselves. For one, autonomy in this area allows EAs to enjoy privacy in using their own phone system for their own offices. The agency phone systems are used to conduct all agency business; not only in selling Allstate policies, but in other communications with third parties essential to conducting business and operating an office. Second, EAs enjoy the ability to use the telephone provider of their choosing and agree to the applicable rates, as well as the ability to set up equipment as the agent prefers.

5. Second, Plaintiff will suffer irreparable harm without a preliminary injunction. Allstate threatens to terminate the EA’s ability to bind business, or to terminate the EA’s agency altogether, if the EA does not implement AAV. At the same time, EAs are responsible for paying

for AAV and implementing it into their agencies. Allstate provides no functioning method to answer any question that EAs may have about implementing AAV. This is a dangerous combination of policies, with EAs potentially losing their livelihood because Allstate is actively breaching its contract with them and then refusing to pay for or help install AAV.

6. Third, Plaintiff has no adequate remedy at law for the injury. The only just remedy is for Allstate to adhere to the EA Agreement and allow EAs to manage their own agency systems and equipment. Monetary damages are an inadequate remedy where EAs face losing both their current and future livelihoods if they refuse to tolerate Allstate's breach; or even if they attempt to implement AAV but fail because Allstate offers practically no help or guidance on the implementation.

7. Finally, Plaintiff has a likelihood of success on the merits of the case. There is little doubt that Allstate is breaching the EA Agreement by forcing EAs to adopt AAV, and that this breach is material in nature. The Agreement clearly states that EAs are responsible for their own equipment and telephone systems, and this provision of the Agreement is a benefit to EAs. Indeed, although forcing EAs to use Allstate's VOIP system for telephonic communication is a breach in and of itself, Allstate does not stop there. Allstate also demands that the EAs pay for the costs associated with running AAV in their agency, with amounts easily running higher than those the EAs could pay an alternative provider of a communication network that works just as well. This mandate clearly contravenes the EA Agreement, and easily amounts to a material breach of that contract.

8. As well as all this, the balance of hardships to the Parties supports the grant of a preliminary injunction, and the preliminary injunction would have a positive impact on the

public. Defendant Allstate will not be harmed if EAs are permitted to employ their own means of telephonic communication within their agencies. Indeed, this is what the EA Agreement requires and how business has been done up to now, without issue. The EAs, on the other hand, have a lot to lose. As stated above, Allstate threatens termination of agencies if the AAV is not implemented, yet Allstate is unable to aid in the implementation. Allstate is also forcing the EAs to pay for the implementation and maintenance of the AAV itself. The public at large benefits from the injunction because it ensures that more agencies stay open in more areas, where they will be able to service the public's insurance needs.

Conclusion

The Court should Plaintiff's Motion for Entry of Preliminary Injunction order Allstate to stop the forced implementation of AAV in EA agencies, because such forced implementation is a material breach of the EA Agreement and can potentially and reasonably result in EAs losing their agencies.

Prayer for Relief

WHEREFORE, Plaintiff NAPAA respectfully requests that the Court grant Plaintiff's Amended Motion for Entry of Preliminary Injunction, enter an order preventing Allstate from continuing its forced AAV implementation program, and award any further relief that this Court deems just and proper.

September 27, 2021

Respectfully Submitted,

/s/ James Bopp, Jr.

James Bopp, Jr. IN # 2838-84*

jboppjr@aol.com

Lead Counsel for Plaintiff

Melena S. Siebert IN # 35061-15*

msiebert@bopplaw.com

Counsel for Plaintiff

THE BOPP LAW FIRM, PC

1 South Sixth Street

Terre Haute, IN 47807-3510

(812) 232-2434 - Telephone

(812) 235-3685 - Facsimile

*Out of State Admission Pending

/s/ Brent Holmes

Brent Holmes, IL Bar No. 3122381

brent@hhlawoff.com

Heller, Holmes & Associates, P.C.

1101 Broadway Ave.

Mattoon, IL 61938

(217) 235-2700 - Telephone

Local Counsel

Certificate of Service

I certify that the foregoing document and all attachments thereto were filed on September 27, 2021, using the court's electronic filing system, which will send notice of the filing to all counsel of record.

/s/ James Bopp, Jr.
James Bopp, Jr.
Lead counsel for Plaintiff

**IN THE CIRCUIT COURT OF
COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

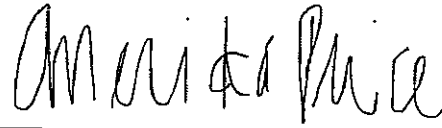
<p>National Association of Professional Allstate Agents, Inc., an association, et al.,</p> <p style="text-align: right;"><i>Plaintiffs,</i></p> <p style="text-align: center;">v.</p> <p>Allstate Insurance Company,</p> <p style="text-align: right;"><i>Defendant.</i></p>	<p>Civil Case No. 2021L007947</p>
--	--

Declaration of Amerida Price

I, Amerida Price, declare:

1. I am a former Exclusive Agent with Allstate Insurance Company, and I have personal knowledge of the facts presented herein.
2. I offer this declaration in support of Plaintiff National Association of Professional Allstate Agents' Amended Motion for Entry of Preliminary Injunction in the above-captioned matter.
3. Submitted with this Declaration are: the Allstate Letter of Understanding, Exhibit 1; Allstate Q&A, Exhibit 2; and AAV Payment Deduction Form, Exhibit 3. I can verify the fact that I received all of the information contained in these Exhibits directly from Allstate and that these Exhibit are true and accurate copies of what I received from Allstate.

Under the penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that she verily believes the same to be true.

A handwritten signature in cursive script that reads "Amerida Price". The signature is written in black ink and is positioned above a horizontal line.

Amerida Price



Byron Gross
District Sales Leader
Zone 2

Via Email

March 24, 2021

A0B1018g@Allstate.com

Amerida Price Agency LLC
Amerida Price
10 S Holland St
Bellville, TX 77418

Letter of Understanding

In the face of evolving regulatory compliance requirements and escalating cybersecurity threats, Allstate recognized the need to have agencies use a uniform phone system to further protect customer information and provide functionality to enhance legal compliance controls. The Allstate Agency Voice ("AAV") phone system is an advanced, comprehensive telephonic technology housed on Allstate's secure, cloud-based platform to replace any third-party telephony services currently used by Allstate Exclusive Agencies.

The introduction of AAV was first announced in the Virtual Agency Town Hall hosted on November 17th and detailed program information was communicated to you and all agencies via an Agency Gateway article on November 19th.

Your Agency is required to transfer the Company's telephone number(s) to AAV, and the AAV Onboarding team attempted to contact your Agency via email and phone at least four times to obtain the required information and documentation to initiate the transfer process with your Agency. To again attempt to facilitate your compliance with the R3001 Agreement and its incorporated materials ("Agreement"), you were notified via email of your obligation to comply with this process and your contractual requirement to transition the Company owned telephone number(s) to the AAV platform. Unfortunately, your Agency failed to respond to these requests or to provide all required information and documentation to transition the Company's telephone number to the AAV platform. Therefore, your Agency's ability to bind business on behalf of the Company was restricted (if applicable).

Your Agreement stipulates specific requirements related to the ownership and use of all telephone numbers used in connection with business conducted pursuant to the Agreement. As such, it is expected that your Agency will adhere to the Agreement and transfer control of the telephone number(s) to the Company via the AAV platform. You have already been informed that your Agency's failure to provide the documents or information requested within the required time period to facilitate the transfer of the telephone number(s) to the AAV platform could result in action up to and including termination of the Agreement.

In order to comply with the terms of the Agreement, your Agency must provide all requested information and documents to the AAV Onboarding team by April 2, 2021 to facilitate transfer of the Company's telephone number. No additional extensions of time will be granted, and any refusal or failure to comply with these requirements will result in the termination of your Agency's relationship with the Company.

Price Decl. Ex. 2

Allstate Agency Voice FAQs

General questions

What is Allstate Agency Voice? x

Allstate Agency Voice (AAV) is advanced, comprehensive telephone technology housed on Allstate's secure, cloud-based platform. Allstate developed and will continually refine this system based on evolving regulatory requirements, marketplace research, agent learnings and feedback.

Why did Allstate develop Allstate Agency Voice? x

In the face of evolving regulatory compliance requirements and escalating cybersecurity threats, Allstate recognized the need to have agents on a uniform phone system to further protect customer information and provide functionality to support compliance controls. This platform will create a consistent approach for Telephone Consumer Protection Act (TCPA) compliance for all agents. In addition, as consumers ask for more value, protection and choice, AAV provides advanced data and analytics to support a consistently superior customer experience. This will help you and your team focus on the value-added activities that customers most appreciate and that drive growth.

How does Allstate Agency Voice support TCPA compliance? x

AAV is integrated with the Leads Manager application. Any outbound calls you make through Leads Manager are TCPA compliant (i.e., they do not appear on any Do Not Call lists). In addition, by mid-2021, all outbound calls made through your AAV platform (not just through Leads Manager) will support TCPA compliance by preventing calls to numbers on a Do Not Call list. Functionality may be enabled to circumvent this call blocking if explicit permission has been received from the party being called.

What does Allstate Agency Voice include? x

Here are some key features and components; you can see a more complete list in the Features and Capabilities section of these FAQs.

- Customer and agent data protected with Allstate's secure cloud-based platform
- Computer softphones (with a physical phone option for an additional cost)
- Speech analytics and transcription capabilities (a feature called "Total Recall")
- Voice analytics, including an agency-performance dashboard (a feature called the "Sales Performance Diagnostic tool")
- Consolidation with Allstate systems, providing a consistent customer experience and system stability

Are all agents going to be moved to the Allstate Agency Voice platform? x

Yes. Once the rollout is completed in 2022, all agents will be on AAV, the Allstate enterprise phone system.

How much does Allstate Agency Voice cost? x

AAV will be provided to agents at a competitive marketplace cost. At a monthly rate of \$23 per line, the cost is comparable to or lower than that of current third-party VOIP providers. Expenses associated with canceling your current phone provider will be discussed prior to onboarding.

How would my business benefit from this new approach? x

Price Decl. Ex. 2

AAV can benefit your business in the following ways:

- It will give you peace of mind knowing customer data is better protected and you can ensure TCPA compliance.
- You'll be using cutting-edge voice technology with all the voice quality and system stability you expect in addition to a host of features you can't get elsewhere, all for a lower cost than you are likely to pay on your own.
- With its voice analytics, it will help you enhance staff coaching, performance and sales processes.
- You'll be able to monitor your LSPs' sales performance trends through a call data dashboard.
- You'll have the flexibility and convenience of softphone capability, which is standard, enabling you to have phone service through your laptop and mobile device. (Physical phones are optional for an additional cost.)

AAV is fully unified with Allstate's billing and self-service interactive voice response (IVR) systems, multilingual (English and Spanish) IVR and automated routing of after-hours calls to Allstate's Customer Contact Centers, all of which promote a more seamless customer experience.

When is the rollout taking place? x

Agents will begin to transition to AAV in groups in the first quarter of 2021. The rollout will continue through 2022.

How will the transition to Allstate Agency Voice take place? x

The transition of Allstate agents to the AAV system will take place in a phased rollout over two years. The rollout will begin in the first quarter of 2021. You will be notified when your agency has been scheduled to begin the transition journey. More details on the AAV rollout will be shared before year-end 2020.

Why is Allstate moving all agents to the Allstate Agency Voice platform? What if I like my current phone system and carrier? x

Agents and Allstate daily face challenges associated with meeting evolving regulatory and compliance requirements such as TCPA and protecting against escalating cybersecurity risks. Allstate and agents must use technology that keeps customer data secure and enhances compliance with customer and prospect contact rules and regulations and other regulatory obligations. With the powerful Allstate Agency Voice system, all voice technology will be on the same secure cloud-based telephone platform. The use of this one approved technology platform will give you peace of mind knowing customer data is better protected and includes features that will make it easier for you to maintain legal compliance. AAV also provides a multitude of other benefits to help you grow your business and better serve customers, in support of Allstate's Transformative Growth Plan.

What if my existing VOIP contract is up for renewal soon? x

If your VOIP contract is renewing before June 30, 2021, please advise your SML. Contract that are active on or before Nov. 1, 2020 will be given consideration for high cancellation fee expenses. To best prepare for this transition and to avoid unnecessary expenses, it is recommended that you identify your VOIP renewal date and coordinate onboarding onto AAV near the time the current contract expires.

What technology changes can I expect when I transition to Allstate Agency Voice? x

Your agency phone system will be transitioned to Allstate's state-of-the-art enterprise voice system, which enables Allstate to develop the necessary connections from your business to

Price Decl. Ex. 2

support the phone system. Some of these items include headsets, softphone technology on the agent's computer, desk phones (if desired), routers (standard or mesh network, depending on the office layout) and switches. In some cases, the installation of wall jacks may be needed to hard-wire a desk phone or computer. A technical survey will be requested with pictures of the agent's office to determine what additional equipment may be required to provide the best possible performance for a wired or wireless environment (depending on need and your preference).

What will change in my business operations because of Allstate Agency Voice? *

Customers will be able to use the self-service options available to them when they call your office, which could reduce incoming calls and increase capacity.

What can customers expect when they call my office? *

Customers or prospects calling your office will hear a locally branded interactive voice response message and will be asked to select among a small set of options to route their request, which will include self-service selections or the option to speak with someone directly in your office.

Do I need to sign a new contract before transitioning to Allstate Agency Voice? *

No. You will not need to sign a new contract. There will be some paperwork to fill out to initiate the transition process.

If I have multiple locations, will all locations be required to move to Allstate Agency Voice? *

All locations will be transitioned to AAV. You will receive education and support to help you maintain smooth operations and consistent customer service.

What happens if I open a new agency location after I have transitioned to Allstate Agency Voice? *

If you enrolled in AAV and open a new agency location or buy an existing book, the new location will be included in the AAV system.

Can I opt out of Allstate Agency Voice? *

No. Allstate is requiring all agents to transition to AAV for their voice technology to ensure the uniform, state-of-the-art data security and support compliance controls. It also provides advanced data and analytics capabilities to help drive your business growth.

What are the next steps after I complete the paperwork to enroll? *

Allstate has a dedicated team, the Agency Voice Onboarding team, to assist you throughout the transition and beyond. After submitting the required paperwork, you will then receive a welcome letter with critical program information and detailed next steps to initiate the onboarding process. It can take up to three months from the time you sign up until your phone system has been converted to the AAV technology platform. This time frame gives you and your staff an opportunity to prepare for this new platform.

Features and capabilities**What are the features and capabilities of Allstate Agency Voice?** *

Here is a rundown of the most noteworthy features and capabilities:

Price Decl. Ex. 2

- Compliance capabilities – AAV will be compliant with PCI (Payment Card Industry) standards from the start and will be compliant with TCPA (Telephone Consumer Protection Act) regulations later in 2021. All voice data would be stored in secured storage location compliant with the emerging regulatory frameworks and consistent with Allstate data storage standards.
- Lead Manager integration – The softphone (standard with AAV) provides a Click to Call feature, which enables users to know that they are only calling safe numbers (i.e., that are not on a Do Not Call List).
- Lead lines – You will be provided with lead lines to allow prospects to bypass the IVR self-service options and call your agency directly. This capability will be effective for any warm lead transfer options or for advertising that targets new prospects.
- Call recording, speech analytics and transcription capabilities (called "Total Recall") – AAV utilizes Total Recall to record and transcribe voice/speech into measurable data and insights. The system can decipher when sales and service events occurred during a recorded call, such as asking for additional business, suggestions to add another line to a policy and client requests for price/premium changes. This information will be available for agents should they wish to use it to improve their overall business results.
- Sales performance diagnostics – Through the system's "Sales Performance Diagnostic tool," agents will be able to evaluate LSP sales and service effectiveness, identify coaching opportunities and implement new processes to improve sales results.
- The system also identifies LSP education gaps and provides real-time data to agents and/or directly to staff. It utilizes the voice analytics to serve up targeted learning modules in real-time. This specific capability, targeted for launch in 2021, will help drive sales performance in key educational areas (e.g., Advisor Pro, cross-selling, closing).
- Agency call dashboards – Key dashboards will be provided to agents for overall agency call data top to bottom within the agency, including all tiers of staff management. Data includes summary and detailed views of inbound/outbound call quantity, calls handle per queue/ring group and call durations.
- Call routing – AAV includes a call-presence indicator, displaying which staff members are available to take a call (within one or multiple agency locations), removing the need to put a caller on hold before transferring.
- Integration with billing and self-service options – The system is fully merged with Allstate's billing and self-service interactive voice response (IVR) systems, multilingual (English and Spanish) IVR and automated routing of after-hours calls to Allstate's contact center.
- The system includes softphones, a hard phone option and the convenience of using the IX Workplace mobile app to employ softphone features on a mobile device.

For the complete list of features, their descriptions, and the benefit to you, visit the AAV features and capabilities page.

How does Allstate Agency Voice differ from my current carrier? x

Allstate compared the AAV platform features and capabilities to a variety of popular carriers in the marketplace. Of the carriers Allstate compared, none came close to matching what AAV offers, including price. The biggest differences are its incorporation with Allstate's secure, cloud-based enterprise voice system, the powerful voice analytics and the sales performance dashboards.

AAV technology

What technology changes can I expect in my agency due to Allstate Agency x

Voice?

Your agency phone system will be transitioned to Allstate's state-of-the-art enterprise voice system, which enables Allstate to develop the necessary connections the agency office. Participation in the AAV operating model requires certain hardware and software specifications to support the phone system. Some of these items will include specific headsets, a softphone, desk

Price Decl. Ex. 2**Why do I need to change my phone system?** x

Agency phone systems must be changed for Allstate to develop the necessary connections from the agency office to the Allstate Agency Voice system to ensure a seamless customer experience.

Will my office meet the technical requirements? x

Transitioning to AAV requires certain hardware specifications to support the new phone system. Some of these items will include headsets, desk phones, routers, and could include installation of additional ports. A technology assessment of your agency will be scheduled with you and take place over the phone with a representative of Agency Voice Technology team. The technology representative will identify any additional needs or requirements from your current office setup.

What is a softphone, and is a softphone an option with Allstate Agency Voice? x

A softphone, or computer phone, is a phone system on your computer or laptop that you can use to accept or make a phone call. Softphone capability, a standard deliverable for AAV, enables you to record calls, access your voice mail and see the phone activity of your staff. The softphone, used with your own headset or one you purchase, eliminates the need to have a physical desk phone. In addition, AAV includes the IX Workplace mobile app, enabling you to employ softphone features on your mobile device. The softphone and IX Workplace mobile app give you the ultimate in flexibility in managing inbound and outbound calls.

What equipment do I need and what are the hardware requirements? x

You need your designated work laptop or desktop, a headset and a desk phone (desk phone is optional). The software for the softphone capability would need to be installed, enabling you to make and receive calls from your computer. You can check the minimum computer and Internet requirements by visiting the Agency Technology minimum requirements page.

Can I use my existing equipment (headset, etc.) if it is compliant with the Allstate Agency Voice phone platform? x

Yes, if you already own a compliant device, it can be used with the Allstate Agency Voice phone platform. If your equipment is not approved, you will need to purchase new equipment. Only the approved equipment has been fully tested to ensure compatibility and will be supported by the Allstate Agency Voice team. The approved equipment may be purchased in the CDW Store after you have confirmed you will be ordering the equipment with the Agency Voice Onboarding team. Here is a list of approved equipment for AAV:

- Desk phone (optional): Avaya J179
- Headsets: Blackwire C3210/C3220; Blackwire C5210/C5220; Encore Pro HW515/HW525; Savi W740
- Switch: MDA220-USB

How will the new phone technology integrate with eAgent? x

As part of the new Allstate Agency Voice phone technology, we will need to install the new phone software onto your office computers. This software will integrate with eAgent and will automatically open eAgent when you receive an incoming call to your agency.

Is Leads Manager integrated with Allstate Agency Voice? x

Yes. You will be able to make outbound calls using Leads Manager with the assurance that the highlighted numbers are compliant with TCPA.

How will I receive my new equipment and what should I do with my old equipment?

Price Decl. Ex. 2

Allstate will partner with your agency to order the necessary phones and headsets required to support Allstate Agency Voice. You may pack up your old equipment for storage, properly dispose of your equipment or, if leasing, return it to your leasing company.

Will my staff need new phone equipment, too?

x

In short, yes. Our goal is to provide your agency with the same or similar capabilities that exist today. The technology vendor's assessment will determine how you and your staff stay connected to your agency system.

How will my equipment be installed for the phone systems?

x

For existing agencies, a member of the Agency Voice Onboarding team will contact you to schedule two appointments: the first for the technology assessment (to be conducted over the phone) and the second for your equipment installation and phone number porting (i.e., switching your agency phones to the Allstate-system). Both appointments will attempt to be scheduled during hours that will not interrupt office service or availability. Duration of the technology assessment should be no longer than 30 minutes; installation duration will depend on your specific office requirements, and phone number connecting will be coordinated with the Agency Voice Onboarding team.

How do I use the new equipment?

x

There will be several opportunities for you to learn how to use both the new equipment and software. In many cases it may be very similar to the systems and software you are already using. In addition to a user guide, job aids and how-to videos will be provided.

Will I keep the same phone numbers I have today?

x

Yes, you will be able to retain your existing phone numbers. Each number will be connected (ported) to the Allstate network, and callers contacting voice numbers will all receive the Allstate Agency Voice IVR treatment.

When an agency transitions to the RightFax solution as part of Allstate Agency Voice, what happens with any existing fax lines that they currently own/use?

x

Agents who transition to Allstate Agency Voice will be given a new toll-free RightFax number. An existing fax number cannot be connected to the Allstate Agency Voice environment. If an existing fax number must be maintained for business purposes, that fax service will need to remain with the current phone service provider at the agent's expense.

Will I have access to call-recording software?

x

Yes. Total Recall is an Allstate call-recording product that will provide recording of all inbound and outbound calls, call transcription and an analysis of sales effectiveness of each call.

Will Allstate be reviewing calls to my agency?

x

An Allstate data and analytics team will be using aggregated call-recording data collected from multiple agencies to gather valuable insights that could help Allstate assess current service delivery to customers and inform enhancements.

What ring group options will I have for my business?

x

For agencies employing up to 10 staff members, Allstate recommends opting for ring groups

Price Decl. Ex. 2

choose the automatic call distribution (ACD) option (for an additional charge), which allows additional queue treatment like that of a call center.

Are there additional reporting capabilities allowing me to gain insight into call metrics and see the capacity created in my agency? x

Agencies using ring groups receive a daily email report providing data on all calls to and from the agency. Work is underway to provide reporting from the self-service portal so that you can run reports whenever you need them. Agencies using automatic call distribution will have access to near real-time reporting through Call Management System.

How will I notify my existing phone carrier that I am changing providers? x

The welcome packet agents will receive includes a Transfer of Service Agreement. The Agency Voice Onboarding team will provide guidance and support throughout the technology-transition process.

What will happen to the data (call recordings, phone data, etc.) my current carrier has? x

Data from your current carrier will NOT be migrated to the new system. Your current carrier should provide access to any historical data.

Will I be able to use lead lines with AAV? x

Yes. You will be provided with "lead lines" to allow prospects to call in directly to your agency without going through the normal self-service options that will be in place on your main office line. This is effective for any "warm lead" transfer options or for advertising you use that is targeted at new prospects.

AAV and Integrated Service

Is AAV part of Integrated Service? x

No. AAV is separate program from Integrated Service. Over the last 18 months, Allstate has learned about agency behaviors, operations, expectations from agents regarding telephone systems, data-security challenges and compliance requirements. Based on those learnings and research on third-party VOIP providers, Allstate developed AAV, which will integrate with Allstate service support without needing additional voice-system integration.

How is Allstate Agency Voice different from the Integrated Service technology? x

AAV is an enhanced agency telephone and analytics platform designed specifically for Allstate agents to support legal compliance and protect customer information. It also will provide sales-performance data and voice analytics to help agents coach staff and drive growth. Integrated Service is a separate offering that provides transactional service for customers, which gives agencies additional capacity to focus on growth activities. For further information on Integrated Service, visit the Integrated Service resource hub.

What is the future of Integrated Service? x

Agents currently using the Integrated Service model are seeing approximately 75 percent of all transactional service calls being handled outside the agency, and those calls are showing overall customer satisfaction of 85 percent. The future is bright for Integrated Service as Allstate continuously looks to improve those results. Upcoming planned improvements include expanding

Price Decl. Ex. 2
service capabilities to current unsupported lines and refining the relationship between the Integrated Service Center and enrolled agents.

Is Integrated Service going to be a required operating model?

In the near term, Integrated Service will continue to be offered to agents on a voluntary basis to help them focus on growth. Allstate Agency Voice is a separate, compliant voice platform that is being rolled out to all agents independent of Integrated Service. Allstate's plan is to help all agencies by providing consistent and integrated service support for customers that will require agencies to be on a unified service delivery platform.

I am already using the Integrated Service model. What does Allstate Agency Voice mean to me?

AAV will have new improved technology that will advance the VOIP features and capabilities you use for Integrated Service, including the addition of voice analytics, the Sales Producer Diagnostic tool and education resources for coaching staff. In addition, with new negotiated prices, your technology fee of \$45 per line per month will be decreased with the new AAV system to \$23 or \$33 per line per month (depending on the plan you chose). You will not need to do anything to get these new rates or to receive AAV; your current system will be upgraded automatically. Communications will be distributed to inform you when to expect these changes.

Direct link to this content: <https://agencygateway.allstate.com/wps/myportal/id/189809>

Price Decl. Ex. 3

I acknowledge that by subscribing to Allstate Agency Voice service, I agree to pay all applicable fees in accordance with my enrollment and that such fees may be periodically adjusted. I authorize Allstate to deduct the fees due for the service to which I am subscribing from my monthly Payment Notification.

The cost of the service you are subscribing to will be subtracted from your commissions each month. Your monthly fee will appear under the "Deductions" section of your monthly Payment Notification. Payments will be deducted monthly, beginning with the month following your service start date.

Your subscription to and/or participation in this program does not replace or in any way change the requirement to adhere to Agency Standards.

With your acceptance below, you are agreeing to these Terms and Conditions.

I agree



Payment Agreement

I acknowledge that by subscribing to Allstate Agency Voice service, I agree to pay all applicable fees in accordance with the fee structure as listed below, and that such fees may be periodically adjusted and I agree to pay the adjusted fees. I authorize Allstate Agency Voice to deduct the fees due for the service in which I am subscribing as outlined below. My total subscription fee will be based on the level of service as defined by the fee schedule below:

Allstate Agency Voice Fee Schedule

There is a monthly fee schedule based on level of service:

Allstate Agency Voice Monthly Standard Fee (Per Line)	\$23
Options	
<i>"Plus" Premium Subscription (cost on top of Standard fee)</i>	\$10
<i>Add an additional Leads Management line (per line cost)</i>	\$5

IN THE CIRCUIT COURT OF
COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

**National Association of Professional Allstate
Agents, Inc., an association, et al.,**

Plaintiffs,

v.

Allstate Insurance Company,

Defendant.

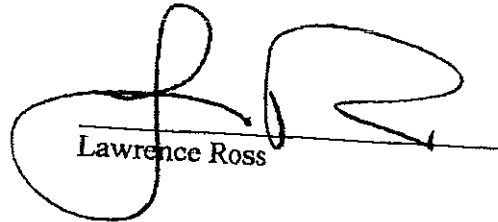
Civil Case No. 2021L007947

Declaration of Lawrence Ross

I, Lawrence Ross, declare:

1. I am a current Exclusive Agent with Allstate Insurance Company, and I have personal knowledge of the facts presented herein.
2. I offer this declaration in support of Plaintiff National Association of Professional Allstate Agents' Amended Motion for Entry of Preliminary Injunction in the above-captioned matter.
3. Submitted with this Declaration is AAV VOIP System Experience, Exhibit 1. I can verify the fact that I received all of the information contained in this Exhibit directly from Allstate and that this Exhibit is a true and accurate copy of what I received from Allstate.

Under the penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.


Lawrence Ross 9-26-2021

Ross Decl Ex. 1
Allstate Agency Voice: VOIP System Experience

AllstateAgencyVoice <AllstateAgencyVoice@allstate.com>
Fri 5/14/2021 2:37 PM

Allstate Agency Voice is a critical tool in your agency. It provides TCPA compliance integrated with Lead Management to help focus on activities that drive growth, support your customers, and increase revenue.

Preparing for Rollout

We took steps to prepare for launch with a focus on reliability, stability, and system experience. Internal and external (vendor) evaluations were completed to ensure high quality standards and an ability to meet performance requirements. Pilots with agency owners were also conducted that demonstrated product stability and agent supportability. Additionally, a phased rollout plan was developed to minimize impact in the event of rollout issues.

VOIP System Experience

While we prepared extensively, there have been instances where some agents have experienced intermittent issues and outages involving impaired system functionality and call quality (e.g. inability to record calls or change caller ID).

We're Taking Action

A vital component of AAV is the underlying server technology. With the recent outage, an issue was identified with server infrastructure. While we rapidly addressed the issue to restore service, the outage is unacceptable.

Immediate Next Steps

AAV system confidence is non-negotiable. A full root-cause analysis and third-party assessment is underway to identify gaps, remediations, and prevent future occurrences. In the interim, immediate actions have been taken with our vendor to further improve stability and implement action plans. As the assessment is completed over the next several weeks, updates will be provided on any material developments.

Our Commitment

You rely on Allstate Agency Voice to conduct business every day. The assessment under way will identify and address opportunities for significant system stability improvement.

Additional Support

- We're here to help. Included below are support paths that provide a wealth of technology support, educational resources, and information to help understand and maximize AAV capabilities.
- Any-time access to program documentation: [Allstate Agency Voice Home Page](#) for resources to increase familiarity with using the new voice technology platform (features and capabilities)
 - First week of business (days two to seven): Agency Voice Support Team or (844) 262-8000, select options 3, then 2
 - After the first week of business (day eight and beyond): Open a chat with [AIGC Online Support](#) or call (844) 262-8000, select options 3, then 2

The Agency Programs Team

Allstate Agency Voice: VOIP System Experience

Ross Decl Ex. 1

AllstateAgencyVoice <AllstateAgencyVoice@allstate.com>

Fri 5/14/2021 2:37 PM

Allstate Agency Voice is a critical tool in your agency. It provides TCPA compliance integrated with Lead Management to help focus on activities that drive growth, support your customers, and increase revenue.

Preparing for Rollout

We took steps to prepare for launch with a focus on reliability, stability, and system experience. Internal and external (vendor) evaluations were completed to ensure high quality standards and an ability to meet performance requirements. Pilots with agency owners were also conducted that demonstrated product stability and agent supportability. Additionally, a phased rollout plan was developed to minimize impact in the event of rollout issues.

VOIP System Experience

While we prepared extensively, there have been instances where some agents have experienced intermittent issues and outages involving impaired system functionality and call quality (e.g. inability to record calls or change caller ID).

We're Taking Action

A vital component of AAV is the underlying server technology. With the recent outage, an issue was identified with server infrastructure. While we rapidly addressed the issue to restore service, the outage is unacceptable.

Immediate Next Steps

AAV system confidence is non-negotiable. A full root-cause analysis and third-party assessment is underway to identify gaps, remediations, and prevent future occurrences. In the interim, immediate actions have been taken with our vendor to further improve stability and implement action plans. As the assessment is completed over the next several weeks, updates will be provided on any material developments.

Our Commitment

You rely on Allstate Agency Voice to conduct business every day. The assessment under way will identify and address opportunities for significant system stability improvement.

Additional Support

We're here to help. Included below are support paths that provide a wealth of technology support, educational resources, and information to help understand and maximize AAV capabilities.

- Any-time access to program documentation: [Allstate Agency Voice Home Page](#) for resources to increase familiarity with using the new voice technology platform (features and capabilities)
- First week of business (days two to seven): [Agency Voice Support Team](#) or (844) 262-8000, select options 3, then 2
- After the first week of business (day eight and beyond): Open a chat with [AT&C Online Support](#) or call (844) 262-8000, select options 3, then 2

The Agency Programs Team