

EXHIBIT TO CERTIFICATION OF ONE RING NETWORKS FOR ROBOCALL MITIGATION DATABASE

This document describes (1) the specific reasonable steps One Ring Networks takes to avoid carrying or processing illegal robocall traffic; (2) One Ring Networks commitment to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium; and (3) One Ring Networks commitment to cooperate with such entities in investigating and stopping any illegal robocallers that use the provider's service to carry or process calls.

The following entities are all subject to the robocall mitigation policies and procedures described in this document:

- EarthLink Holdings, LLC
- One Ring Networks, Inc.
- Telegia Communications, Inc.
- KY FWA Buyer, LLC
- MN FWA Buyer, LLC

EarthLink Holdings, LLC owns (1) One Ring Networks, Inc., which in turn owns Telegia Communications, Inc. and (2) KY FWA Buyer, LLC. and (3) MN FWA Buyer, LLC., and All these entities are subject to the same robocall mitigation plan. For the purposes of this document, these entities are collectively referred to as "One Ring Networks."

One Ring Networks adheres to and responds to any Robo Call Mitigation/Trace requests in a timely manner and with full trace/pcap details. One Ring Networks Keeps and Maintains Meta Data for 7 year's to assist the FCC, FTC and any Law Enforcement in any and all actions including Trap and Trace requiring documentation of date, time, source and destination. One Ring Networks also maintains a database of all TN's that may originate from their switch and requires caller ID for all outbound calling. Any customer wishing to use a caller id not Owned but Originating from One Ring Networks agrees and understands that they may be subject to robocall mitigation and One Ring Networks Maintains Customer of Record for all TN's advertised from a One Ring Networks switch network.

EFFORTS TO AVOID ORIGINATING ILLEGAL ROBOCALLS AS PART OF THE ROBOCALL MITIGATION PROGRAM One Ring Networks has made meaningful investments to implement network upgrades and offer new features to combat illegal robocalls as part of its robocall mitigation program. One Ring Networks deploys multiple systems to detect potential robocall activity based on statistics such as average call duration, Answer Seize Ratio (“ASR”), Source and Destination matching and call count carrier/consumer reports. As part of its robocall mitigation program, One Ring Networks provides the following solutions on its network to help minimize the impact of illegal or unwanted robocalls on customers: •

Proactive Blocking: Applied to all traffic. In certain circumstances, One Ring Networks also blocks calls that originate from invalid, unallocated, or unused numbers. Through reports generated by Call Detail Record (“CDR”) and pattern trends, fraud information sharing through industry organizations, and third-party notifications and complaints, One Ring Networks is able to identify potential unlawful robocalling. In some situations, when One Ring Networks suspects it has identified unlawful calling, in addition to taking the steps identified above, it also may contact the party sending One Ring Networks the calls (i.e., One Ring Networks carrier/provider/customer), and request that they work to investigate their customers/users (e.g., to identify the party sending them the calls, determine whether the calls are unlawful, and then to eliminate the source of the calling). When One Ring Networks believes it has identified fraudulent activity, it reserves the right to take any action it deems necessary to eliminate the fraudulent activity.

Know Your Customer Program One Ring Networks has established and implemented comprehensive Know Your Customer (“KYC”) policies for any new and existing customers. The objective of the KYC policy is to prevent One Ring Networks from being used, intentionally or unintentionally, for spoofed or illegal traffic. KYC procedures enable One Ring Networks to know and understand its customers and their use policy better, which in turn helps One Ring Networks manage unacceptable traffic. Each Customer is Sourced with a Customer ID number and Permitted IP Space to initiate calls from and any deviation is instantly blocked from completion and alerts are sent to our Network Operations Centers Provisioning Department for remediation. In Addition, all Customers that initiate calls from the One Ring Networks Network have daily, weekly and monthly monitor limit set on their usage for analytical and mitigation purposes.

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