



Carolina West Wireless Inc. (or “Company”) submits this certification pursuant to section 64.6305(d) of the Federal Communications Commission’s (FCC’s or Commission’s) rules. Identifying information is provided in the Appendix.

STIR/SHAKEN Implementation

Carolina West Wireless Inc.’s role in the call chain is a voice service provider. The Company has fully implemented STIR/SHAKEN. All calls that originate on our network are compliant with section 64.6301(a)(1) and (2) of the FCC’s rules.

Enforcement

All calls that originate on the Company’s network are subject to the attached Robocall Mitigation Program.

The Company and/or any entity for which the filing entity shares common ownership, management, directors, or control has never been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing.

The Company has not been prohibited by the Commission from filing in the Robocall Mitigation Database.

Traceback

Carolina West Wireless Inc. commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any robocalls that use our service to originate unlawful robocalls. Carolina West Wireless Inc. will respond fully within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium and cooperate with such entities in investigating and stopping any robocalls that use its service to carry, process, or originate robocalls.

I, Thad Southers, CFO, Chief Financial Officer for Carolina West Wireless Inc., submit this certification on behalf of the Company, which has implemented the STIR/SHAKEN authentication framework as indicated in the Robocall Mitigation Database. Pursuant to section 1.16 of the FCC's rules, I certify, under penalty of perjury, that the information and statements contained herein are true and correct to the best of my knowledge and belief.

A handwritten signature in blue ink, reading "Thad Southers", is written over a horizontal line.

Thad Southers
Chief Financial Officer
Carolina West Wireless Inc.

Robocall Mitigation Program

Carolina West Wireless Inc. has taken specific reasonable steps to avoid carrying or processing illegal robocall traffic.

Carolina West Wireless Inc. has retained Transaction Network Services (TNS) to implement call analytics to mitigate robocalls. TNS provides call blocking and filtering analytics from the TNS Call Guardian product to stop any callers suspected of illegal robocalling or spoofing over our network. The TNS product analyzes high-volume network traffic to identify and monitors patterns consistent with robocalls and provides real-time reports of suspicious activity.

Carolina West Wireless Inc. uses Call Data Records to generate daily reports for short duration calls to identify potential robocalls. We have implemented fraud detection in our Least Cost Routing engine to block, in real time, multiple calls from a single user once such calls reach a threshold.

The Company's service agreements contain acceptable use and traffic integrity terms that prohibit the use of our services for illegal purposes, including the following:

- Using the service or device to engage in any activity that is or reasonably could be considered unlawful or that negatively affects CWW's company, subscribers, employees, or the company reputation or perception of the service provided.
- Any act that interferes with CWW's operations, network, or ability to provide quality service.
- Generation or dissemination of viruses, malware or "denial of service" attacks.
- Tampering with or modifying your device in any way that would harm CWW, CWW's network, or other users facilitate violation of this policy.
- "Spamming" or engaging in abusive, unsolicited or other unwanted communications, or any other mass, automated voice or data communication for commercial or marketing purposes.
- Using the service for purposes other than personal, family or household use (unless you have subscribed to a commercial or wholesale service plan and then only to the extent allowed by your plan), including for example, as a dedicated data connection, or in connection with any server or host applications, including continuous web camera broadcasts, automated data feeds, machine-to-machine connections or applications that are broadcast to multiple servers or recipients, for resale, connecting to other devices that may be used outside your household or by persons not part of your household including "hotspots".
- The use or deployment of applications commonly used for unlawful, fraudulent, or infringing purposes such as "bots" also known as web robots, WWW robots, are software applications that run automated tasks over the Internet running software or other devices that maintain continuously active Internet connections when a computer's connection would otherwise be idle, or "keep alive" functions.

If it is determined that a customer is originating prohibited, unlawful calls on our network, the Company will take appropriate action, consistent with our Acceptable Use Policy (AUP). Violators

of the AUP or federal, state, or local laws may receive a warning to stop unlawful activity and may have their service suspended or terminated.

Know-Your-Customer. Carolina West Wireless Inc. vets new and renewing customers by asking personally identifiable questions. We will confirm the identity of new or renewing residential and business customers by collecting identifying information including, as applicable, SSN, date of birth, contact person for the business, physical address, state and/or country of incorporation, and federal tax ID. New customers requesting an excessive number of call paths will be screened for legitimate usage needs. New and existing customers with an excessive number of call paths will receive robocall outreach and education materials.

Caller ID and call records are reviewed when service is installed to verify legitimate caller ID information.

Know-Your-Upstream Provider. The Company knows all carriers from which it directly receives traffic. Carolina West Wireless Inc. has confirmed that all connected providers are listed in the Robocall Mitigation Database. The Company shares call authentication data with connected service providers.

Traceback. We will respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and will cooperate with such entities in investigating and stopping any robocalls that use our network to originate robocalls.

The Company reserves the right to modify and/or supplement its robocall mitigation plan to adapt to risks and to improve the overall effectiveness of its program.

Appendix
Identifying and other information

All business names previously used:

Carolina West Wireless Inc. d/b/a Carolina West Wireless
Carolina West Wireless Inc. d/b/a Bark Mobile

Other business names currently in use:

Carolina West Wireless Inc. d/b/a Carolina West Wireless
Carolina West Wireless Inc. d/b/a Bark Mobile
Clear Stream Communications, LLC

Company is not a foreign voice service provider.

Affiliates: None

Parent Companies:

Skyline Telephone Membership Corporation, Kim Shepherd
Surry Telephone Membership Corporation, Richie Park

Principal:

Slayton S. Stewart
Chief Executive Officer
Slaytons@carolinawest.com
(336) 957-7750

Subsidiaries: None

Individual within company responsible for addressing robocall mitigation-related issues:

Paul Feldmann, VP Engineering
Network Engineering,
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