

Waverly Hall Telephone, LLC – Robocall Mitigation Plan

Waverly Hall Telephone, LLC (Waverly Hall), Operating Company Number 0392, is eligible for the continuing extension of the STIR SHAKEN implementation deadline as a small voice service provider (§64.6304 (a)(2) that has non-IP portions within its network §64.6304(d).

Waverly Hall provides local service to fewer than 100,000 voice subscriber lines. The majority of the Waverly Hall's customers are served on the non-IP portions of its network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

Waverly Hall's non-IP network is connected to carriers that do not support IP connectivity; therefore, Waverly Hall cannot upgrade that portion of its Non-IP network to IP.

Waverly Hall also originates calls within its network via SIP connection. Waverly Hall has registered with the Policy Administrator (via its affiliate Rye Telephone Company) and is an authorized service provider in the STIR|SHAKEN ecosystem. Waverly Hall has implemented STIR|SHAKEN within its IP-network and signs the calls originating on the IP portions of Waverly Hall's network.

Robocall Mitigation Plan

Waverly Hall has taken reasonable steps and has mitigation processes in place to recognize and to ultimately reduce the origination of illegal robocalls on our network and continuously works to expand and enhance them. All voice traffic that originates on Waverly Hall's network is subject to the following Robocall Mitigation Plan.

Call Analytics

- Waverly Hall does not use a third-party call analytics vendor. Waverly Hall monitors its originating traffic to identify calls that meet the criteria for suspected illegal robocalls. Waverly Hall's internal call analytics procedures are described below.

Policing and Monitoring

- Continuous internal monitoring and analyzation of originating call detail records to identify anomalies and abnormalities that conflict with our established baselines of normalcy. Our baselines of normalcy are established over years of analyzing voice traffic on our network and the typical behavior of our voice subscribers. Using this historical data, past and present, we can easily identify potentially malicious behavior and act quickly to qualify legitimacy and mitigate when necessary. Mitigation may include subscriber services termination.

- Participation in Domestic Toll Fraud mitigation with one of our strategic partners that is designed to specifically identify and mitigate robocalls and call pumping. This domestic toll fraud mitigation actively monitors area codes and OCN's with a history of illegitimate intent and has technical processes in place to flag and block calls based on unusual activity. Some of the unusual activities include frequency of calls to one number in short periods of time (call pumping) and the length of calls, etc.
- We monitor our IP network utilizing state of the art network monitoring tools to identify abnormalities within our Session Border Control and throughout our voice delivery network. We block offending IP's and phone numbers as we identify abuse participants.
- We have tight security measures in place to prevent unauthorized access to subscriber phones and voicemail.

Know Your Customers - Acceptable Use Policy:

- Waverly Hall has standard practices of confirming that businesses are legitimate and have legitimate, normal, and well-intended interest in the use of our voice services prior to permitted use.
- All subscribers are subject to vetting of their identity and legitimacy which includes:
 - Physical business location
 - Contact person responsible for the account
 - State or County of incorporation
 - Nature of customers business

Upstream Provider Knowledge

Waverly Hall knows all the carriers from which it receives traffic and has confirmed that all of the carriers are listed in the Robocall Mitigation Database.

Waverly Hall monitors incoming traffic from all connected carriers for suspicious call patterns indicative of illegal robocall activity.

The connected carriers are made aware of any suspicious or illegal traffic identified and notified, that if the traffic does not cease, the calls may be blocked from entering Waverly Hall's network. No provider is using Waverly Hall's network to carry or process a high volume of illegal traffic. In addition, Waverly Hall is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.

- Waverly Hall is a voice service provider with a STIR/SHAKEN implementation obligation on the IP-Portions of its network.
- Waverly Hall is also a voice service provider without a STIR/SHAKEN obligation on the Non-IP portions of its network because that portion of its network is connected to

carriers that do not support IP connectivity and therefore still relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls

Traceback and Communications

- Waverly Hall has a dedicated contact for receiving communications or points of concern for traceback investigations.
- Waverly Hall commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to originate calls.
- Waverly Hall will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium within twenty-four (24) hours.
- Waverly Hall posts robocall mitigation information on our website and allows our customers to opt in and opt out of our blocked call program.

Robocall Mitigation Database Eligibility

- Waverly Hall has not been involved in any formal law enforcement or regulatory investigation into suspected unlawful robocalling.
- Waverly Hall has not been prohibited from filing in the Robocall Mitigation Database (RMD).

Principals, Affiliates, Subsidiaries, and Parent Companies

Affiliates and/or Subsidiaries of Waverly Hall that provide voice services are listed below. Chris Reno serves as VP-Controller and Corporate Secretary of each entity and Rob Mills serves as CEO of each entity. See below for the ownership details.

Issuer (Loan Party / Subsidiary / Minority Investment)	Holder/ Owner	Type of Interest	Certificate No.	No. of Shares/ Units	% Owned
ITC Broadband Capital, LLC	ITC Broadband Holdings, LLC	Membership Interest	N/A	N/A	100%
ITC Fiber Holdings, LLC	ITC Broadband Capital, LLC	Membership Interest	N/A	N/A	100%
ITC Rural Connect, Inc.	ITC Fiber Holdings, LLC	Common Stock	CS-001	100	100%
ITC Broadband Operating, LLC	ITC Fiber Holdings, LLC	Common Interest	N/A	98 Common Interests	98%
	ITC Rural Connect, Inc.	Common Interest	N/A	2 Common Interests	2%
		Preferred Interest	N/A	100 Preferred Interests	100%
USConnect Holdings, LLC	ITC Broadband Operating, LLC	Membership Interest	N/A	N/A	100%
The Livingston Telephone Company, LLC	USConnect Holdings, LLC	Membership Interest	N/A	N/A	100%

Telcom Supply, LLC	The Livingston Telephone Company, LLC	Membership Interest	N/A	N/A	100%
USConnect Acquisitions II, LLC	USConnect Holdings, LLC	Membership Interest	N/A	N/A	100%
Waverly Hall Communications, LLC	USConnect Acquisitions II, LLC	Membership Interest	N/A	N/A	100%
Waverly Hall Telephone, L.L.C.		Membership Interest	N/A	N/A	100%
S&A Communications, LLC		Membership Interest	N/A	N/A	100%
S & A Telephone Company, LLC		Membership Interest	N/A	N/A	100%
Mid-South Cellular, LLC	S&A Telephone Company, LLC	Membership Interest	N/A	N/A	100%
Highline Colorado, LLC	USConnect Holdings, LLC	Membership Interest	N/A	N/A	100%
Corona Holdings, LLC	Highline Colorado, LLC	Membership Interest	N/A	N/A	100%
South Park L.L.C.	Corona Holdings, LLC	Membership Interest	N/A	N/A	100%
The Rye Telephone Company, LLC		Membership Interest	N/A	N/A	100%
CableCo, LLC		Membership Interest	N/A	N/A	100%
USConnect Acquisitions IV, LLC	USConnect Holdings, LLC	Membership Interest	N/A	N/A	100%
Newcastle Holdings, LLC	USConnect Acquisitions IV, LLC	Membership Interest	N/A	N/A	100%
Highline Services, LLC	USConnect Holdings, LLC	Membership Interest	N/A	N/A	100%

Dalton Telephone Company, LLC	Newcastle Holdings, LLC	Membership Interest	N/A	N/A	100%
Dalton Telecommunications, LLC		Membership Interest	N/A	N/A	100%
Elsie Communications, LLC		Membership Interest	N/A	N/A	100%
Aspire Networks 1, LLC	ITC Broadband Operating, LLC	Membership Interest	N/A	N/A	100%
ITC Broadband East Texas, LLC	Telecom Supply, LLC	Membership Interest	N/A	N/A	100%