

**City of Fort Collins d/b/a Fort Collins Connexion (“Connexion”)
ROBOCALL MITIGATION PLAN**

The City of Fort Collins, Colorado d/b/a Fort Collins Connexion provides broadband and resold interconnected VoIP services within its jurisdiction under the brand Connexion. The City’s wholesale VoIP provider is Momentum Telecom, Inc. (“Momentum”), which is registered in the Robocall Mitigation Database with a full STIR/SHAKEN implementation.

While Connexion necessarily relies on Momentum’s robocall mitigation policies, procedures, and safeguards, it has also adopted this robocall mitigation plan to take its own measures to limit the potential for the origination of unlawful robocalls by its customers that would be carried and processed by Momentum and other downstream providers.

Know-Your-Customer Policies

Subscriber Vetting: Connexion vets the identity of its customers when approving an application and entering into an agreement to provide telephone service. Services are provided to fixed locations and services are installed on location by employees/agents of Connexion, ensuring the actual location of its customers. Connexion verifies residential customers’ legal name and address using a driver’s license or other government-issued photo identification and verifies commercial customers through collection of their EIN. This information enables Connexion to validate the identity of potential customers prior to provisioning of service. Service will not be provided if a new customer’s identification cannot be verified.

Contractual Terms: Connexion’s Terms and Conditions does not allow any of its services for unlawful means of any kind, including robocalls. Customers in violation of our Term of Conditions may have services terminated.

Use of Call Analytics to Identify and Block Unlawful Traffic

Connexion relies on Momentum’s use of call analytics systems to identify and block unlawful robocall traffic as set forth in its robocall mitigation plans on file with the FCC. Momentum reports that its call analytics can detect call patterns that indicate robocall activity, including, but not necessarily limited to, an unusual large number of calls from the same number, an excessive number of short duration calls, and calls that stop attempting to connect after a

single ring, and calling numbers that are invalid, unallocated, or on the Industry Traceback Group's Do Not Originate ("DNO") list.

If Connexion receives a report or alert from Momentum of suspected unlawful robocall traffic originated by its end user customer, it will conduct an investigation. To the extent a customer is found to have violated the terms of service, Connexion will take action commensurate with the severity of the customer's offense, including, but not limited to, providing the customer with a warning or terminating the customer's service without notice.

Knowledge of Upstream Providers

Momentum is a well-known, reputable wholesale service provider that is registered in the FCC's Robocall Mitigation Database. Connexion does not have knowledge or insight into upstream providers from which Momentum receives traffic, but understands from its mitigation plans that its direct upstream connections are with service providers that similarly have represented to the FCC that they have policies and procedures to identify and block unlawful robocall traffic.

Cooperation with the Traceback Group, Law Enforcement and Government Agencies

Connexion is committed to responding fully and within 24 hours to all traceback requests made by the Industry Traceback Group ("ITG"), law enforcement authorities, and government agencies to investigate and address suspected unlawful robocalls originated by its customers, and to cooperating with Momentum on traceback requests. The City understands that its wholesale providers will block all calls and provider traffic that: (1) are identified in any public notice or order released by the FCC; (2) are substantially similar to the types of traffic identified in any public notice or order released by the Commission; or (3) include a caller ID number or name that is on DNO list issued by ITG.