

IRVINE COMMUNITY TELEVISION, INC.

ROBOCALL MITIGATION PLAN

Irvine Community Television, Inc. (“Irvine”) is a broadband provider that offers interconnected VoIP services to its subscribers on a resold basis. Irvine’s wholesale VoIP provider is Momentum Telecom, Inc. (“Momentum”), a provider of wholesale and retail VoIP and other communications services across the United States.

While Irvine necessarily relies on the robocall mitigation policies, procedures, and safeguards instituted by Momentum, Irvine 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: Irvine vets the identity of its customers when approving an application and entering into a contract for telephone service. As part of this vetting process, Irvine collects the customer’s legal name and address, State issued ID, physical location, and contact information. Irvine’s services are provided to fixed locations using its own network and services are typically installed on location by its personnel, so Irvine knows the actual location of its customers. All of this information enables Irvine to validate the identity of potential customers prior to provisioning of service. Irvine will not provide service if a new customer’s identification cannot be verified.

Contractual Terms: Irvine’s Acceptable Use Policy (“AUP”) prohibits the use of its telephone service to commit a crime or fraud or violate any applicable laws or Irvine’s policies, and prohibits customers from impersonating another person or falsifying calling party identification information. Irvine may terminate a customer’s service for violations of its AUP.

Use of Call Analytics to Identify and Block Unlawful Traffic

Irvine relies on Momentum’s use of call analytics systems to identify and block unlawful robocall traffic as set forth in Momentum’s robocall mitigation plan on file with the FCC. Momentum reports that the call analytics it employs for Irvine’s traffic 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 Irvine receives a report or alert from Momentum of suspected unlawful robocall traffic originated by an Irvine end user customer, Irvine will conduct an investigation. To the extent a customer is found to have violated Irvine’s AUP, Irvine 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.

Knowledge of Upstream Providers

Irvine's upstream provider, Momentum, is a well-known, reputable wholesale service provider that is registered in the FCC's Robocall Mitigation Database. Irvine does not itself have knowledge or insight into the upstream providers from which Momentum receives traffic, but understands from Momentum's mitigation plan that Momentum's 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

Irvine 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 Irvine customers.

Irvine is also committed to cooperating with Momentum on traceback requests and to fully complying with the Commission's robocall blocking requirements. Irvine understands that Momentum 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.