

COAST COMMUNICATIONS CO.

ROBOCALL MITIGATION PLAN

Coast Communications Co. ("Coast") is a broadband provider that offers interconnected VoIP services to its subscribers on a resold basis. Coast'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 Coast necessarily relies on the robocall mitigation policies, procedures, and safeguards instituted by Momentum, Coast 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: Coast vets the identity of its customers when approving an application for telephone service. As part of this vetting process, Coast collects the customer's legal name and address, physical location, contact information, and, for most commercial customers, federal tax ID, and Coast may require additional information to validate the customer. Coast's services are provided to fixed locations using its own network and services are typically installed on location by Coast personnel, so Coast knows the actual location of its customers. All of this information enables Coast to validate the identity of potential customers prior to provisioning of service. Coast will not provide service if a new customer's identification cannot be verified.

Contractual Terms: Coast's Agreement for Residential Services ("Subscriber Agreement") and Acceptable Use Policy for Residential Voice Services ("Phone AUP") prohibit the use of Coast's voice service for any unlawful purpose, including, but not limited to, "fraud, or other abuse of phone services" and "auto-dialing, continuous or extensive call forwarding, telemarketing, fax broadcasting or fax blasting, or for any other use that results in usage inconsistent with normal residential calling patterns." To the extent a customer is found to have violated the terms of the Subscriber Agreement or the Phone AUP, Coast will take any responsive actions, including but not limited to, the immediate suspension or termination of the service, as it deems appropriate under the circumstances.

Use of Call Analytics to Identify and Block Unlawful Traffic

Coast 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 Coast'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 Coast receives a report or alert from Momentum of suspected unlawful robocall traffic originated by a Coast end user customer, Coast will conduct an investigation. To the extent a

customer is found to have violated Coast's Subscriber Agreement or the Phone AUP, Coast 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

Coast's upstream provider, Momentum, is a well-known, reputable wholesale service provider that is registered in the FCC's Robocall Mitigation Database. Coast 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

Coast 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 Coast customers.

Coast is also committed to cooperating with Momentum on traceback requests and to fully comply with the Commission's robocall blocking requirements. Coast 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.