

Carnegie Telephone Company Robocall Mitigation Program

This Robocall Mitigation Plan describes the specific reasonable steps that Carnegie Telephone Company (Carnegie) has taken to avoid the origination, carrying, or processing of illegal robocall traffic. In addition, Carnegie's affiliate companies – TSC, Inc., Lightspeed Services, LLC, and/or Carnegie Long Distance, LLC – may resell or otherwise offer certain products or services under their own names or the name of Carnegie Telephone Company. As such, this plan also applies to those affiliates.

Carnegie's voice services are provided over both time division multiplexing (TDM) and Internet protocol (IP) technologies. TDM-based voice service is provided over switches owned and controlled by Carnegie. However, voice over IP (VoIP) service is provided via resale, utilizing the underlying networks of [REDACTED]. Cellular/Mobile voice services is provided through a managed MVNO arrangement with [REDACTED], which utilizes the underlying networks, management, and mitigation measures of [REDACTED] respectively.

Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Robocalls

Carnegie has a "know-your-customer" policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. Carnegie vets the identity and physical location of all new and renewing end-user customers. With regard to business customers, we collect information such as their physical business location, contact person(s), state or country of incorporation, federal tax ID, and the general nature of their business. Carnegie does not entertain requests for high-volume origination services, but were we ever to consider one, we would exercise caution and extensively investigate the requesting entity prior to providing service.

In addition, Carnegie has enforceable terms and conditions for the use of its services that define the circumstances by which we will deny, suspend, or terminate service to a customer. Carnegie would not hesitate to suspend or terminate service to a customer that we discovered was using, or attempting to use, our services to originate illegal calls.

"Know-Your-Upstream Provider" Procedures

Currently, the only upstream provider from which Carnegie receives traffic on its TDM switches is [REDACTED]. Carnegie's connection with [REDACTED] has been in place for many years, and we know them very well. Before accepting traffic from any new upstream provider, Carnegie would exercise due diligence and seek to ensure that the provider is not using Carnegie to carry or

process a high volume of illegal traffic. Specifically, Carnegie would collect information such as the upstream provider's physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of their business.

With regard to calls terminating to Carnegie's VoIP customers, we rely upon the "know-your-upstream provider" procedures of [REDACTED], whose networks Carnegie relies upon to offer VoIP service. Carnegie is confident that these network carriers exercise due diligence before accepting traffic from an upstream provider.

Use of Call Analytics Systems

Carnegie analyzes all incoming voice calls to its network by utilizing the [REDACTED]. The [REDACTED] provides a "score" mechanism that rates every incoming call based on their proprietary algorithms and analysis. Calls that receive a high score are automatically blocked. Factors that can cause a high score may include, but are not necessarily limited to the following: History of fraudulent calls originating from a number; calls coming from unused or unassigned numbers or prefixes (NXX); calls from otherwise disconnected or terminated numbers; calls from numbers with incomplete or otherwise corrupted Caller ID data; and calls from numbers that have generated unusually large bursts of call activity or systematic dialing.

Traffic analysis is comprehensive and ongoing. Call data is reviewed on an ongoing basis, and changes are made to limit the quantity and occurrence of fraudulent calls.

Commitment to Respond to Traceback Requests

Carnegie commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its services to originate, carry, or process illegal robocalls.