



**Westgate Communications LLC
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Westgate Communications LLC d/b/a WeavTel Robocall Mitigation Program

This Robocall Mitigation Plan describes the specific reasonable steps that Westgate Communications LLC d/b/a WeavTel (“WeavTel”) has taken to avoid the origination, carrying, or processing of illegal robocall traffic. WeavTel is a very small incumbent local exchange carrier (ILEC) in Washington, with fewer than 100 voice customers. WeavTel’s voice service is provided via Sinch/Voyant Communications’ cloud switch service. Sinch/Voyant Communications performs all switching operations for WeavTel’s voice service. Therefore, WeavTel does not have control over the network infrastructure necessary to implement STIR/SHAKEN. Implementation of the STIR/SHAKEN framework for WeavTel’s voice customers is performed by Sinch/Voyant Communications.

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

WeavTel has a “know-your-customer” policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. As a very small service provider, WeavTel has a basic personal relationship with all of its customers and verifies with each of its customers that they will not be using their service to make illegal robocalls. All of WeavTel’s business customers are small businesses that are physically located in our service territory. Prior to a new business customer ever making a call, we personally know, or get to know, the business owners and/or management. This personal touch gives WeavTel a clear view of whether the business is a risk for originating illegal robocalls.

WeavTel has never received a request for high-volume origination services. However, were WeavTel to ever receive such a request, we would exercise caution and extensively investigate the requesting entity prior to granting access to the service. In particular, we would 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.

In addition, as a very small service provider, WeavTel would be able to quickly recognize and address illegal robocalls being generated by any of its customers. WeavTel reviews each customer’s monthly minutes of use to verify that their usage falls within a normal range. If there was an abnormally high volume of calls being made by a customer, WeavTel would investigate the reason. If, following an investigation, it was determined that a customer was using their service to originate illegal traffic, WeavTel would not hesitate to suspend or terminate their service, as appropriate.



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“Know-Your-Upstream Provider” Procedures

WeavTel relies upon the “know-your-upstream provider” procedures of Sinch/Voyant Communications, whose cloud switch service WeavTel uses to offer voice service. WeavTel is confident that Sinch/Voyant Communications exercises due diligence before accepting traffic from an upstream provider.

Use of Call Analytics Systems

WeavTel’s voice service, provided via Sinch/Voyant Communications’ cloud switch service, utilizes call analytics employed by Sinch to identify and potentially block illegal robocalls.

Commitment to Respond to Traceback Requests

WeavTel 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.