

Northern Valley Communications, LLC

Robocall Mitigation Program

This Robocall Mitigation Plan describes the specific reasonable steps that Northern Valley Communications, LLC (“NVC”) has taken to avoid the origination, carrying, or processing of illegal robocall traffic on its network.

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

NVC has a “know-your-customer” policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic.

Prior to a new business customer ever making a call on NVC’s network, we personally know, or get to know, the business owners and/or management. If we don’t already know the key people in the business, we ask others in the community who they are and the nature of their business. This personal touch gives NVC a clear view of whether or not the business is a risk of originating illegal robocalls.

In addition to NVC’s personal knowledge of our business customers, we have implemented contract terms that forbid the origination of robocalls. Violation of this prohibition results in the termination of the customer’s service.

NVC’s billing staff routinely monitors customers for large changes in outgoing call usage. This practice allows us to identify a situation where a customer begins originating an unusually high number of calls.

Although NVC’s customers generally do not generate a high volume of calls, were NVC to receive a request for high-volume origination services, we would exercise caution and extensively investigate such customers before granting access to the services.

In addition to its role as a local exchange carrier, NVC also offers long distance service to its local voice customers via a long-standing resale arrangement with Express Communications. Express Communications provides warnings and notifications to NVC if it observes a customer making an excessive number of outgoing calls. NVC takes these warnings and notifications seriously and investigates each one.

Know-Your-Upstream Provider Procedures

The connections that NVC has with upstream providers have been in place for many years, and we know these companies well. However, NVC exercises due diligence before accepting traffic from any new upstream provider as we seek to ensure that such providers are not using NVC to carry or process a high volume of illegal traffic. Specifically, NVC collects 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.

Use of Call Analytics Systems

NVC does not utilize call analytics systems.

Commitment to Respond to Traceback Requests

NVC 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 illegal robocallers that use its service to originate, carry, or process illegal robocalls.