

**ROBOCALL MITIGATION PLAN FOR
Finger Lakes Communications Group, Inc., d/b/a GoNetspeed Management**

Finger Lakes Communications Group, Inc., d/b/a GoNetspeed Management is complete STIR SHAKEN compliant.

Finger Lakes Communications Group, Inc. uses a third-party numbering partner for assignment of numbers to its voice customers; therefore, Finger Lakes Communications Group, Inc. is not assigned an OCN.

Finger Lakes Communications Group, Inc.’s Principals, Affiliates, Subsidiaries and Parent Companies are:

Future Fiber Parent LP
Future Fiber Holdings LLC
Future Fiber FinCo LLC
Otelco Parent, Inc.
Otelco, Inc.
Netspeed Holdings, Inc.
Netspeed Parent, Inc.
Lantek Fiber Optic Services, Inc.
Lantek Communications NY, Inc.
Icon Connections, Inc.
Otelco Telecommunications LLC
Pine Tree Telephone LLC
Saco River Telephone LLC
Mid-Maine Telecom LLC
CRC Communications LLC
Mid-Maine TelPlus LLC
Granby Telephone LLC
Netspeed LLC
Shoreham Telephone LLC
War Telephone LLC
Otelco Mid-Missouri LLC
Hopper Telecommunications LLC
Otelco Telephone LLC
Blountsville Telephone LLC
Brindlee Mountain Telephone LLC
Trumansburg Telephone Company, Inc.
Ontario Telephone Company, Inc.
Netspeed Management, Inc.

Finger Lakes Communications Group, Inc. originates all calls via SIP connections handled by a Metaswitch operated by a GoNetspeed Management affiliate, CRC Communications LLC d/b/a GoNetspeed Management (OCN 1255) (“CRC”). CRC is registered with the Policy Administrator and is an authorized service provider in the STIR/SHAKEN ecosystem. Finger Lakes

Communications Group, Inc. has implemented STIR/SHAKEN within its network and CRC Communications LLC d/b/a GoNetspeed Management signs the calls originating on the IP portions of the Finger Lakes Communications Group, Inc. Network.

ROBOCALL MITIGATION PLAN

All voice traffic that originates on Finger Lakes Communications Group, Inc.'s network is subject to the following Robocall Mitigation Plan.

Finger Lakes Communications Group, Inc.'s affiliate CRC has contracted with Equinix to provide robocall analytics and reputation scoring of the network's outbound traffic. Equinix uses software to monitor outbound voice traffic using call detail records in 15-minute to 6-hour intervals and will send detailed reporting identifying if the network originates any calls where the calling number is invalid, unallocated, or is otherwise suspicious. If suspicious activity is detected, Equinix will send an alert to the Network Operations Center (NOC) that is shared by GoNetspeed Management affiliates.

Call Analytics & Investigation

Finger Lakes Communications Group, Inc. investigates calls identified by Equinix as suspicious calls or those that have abnormal call volumes, patterns, or activity consistent with illegal robocalls. When Equinix sends an alert to the NOC an employee will evaluate the report to determine if the traffic is legitimate or not. If the traffic appears suspicious, the employee will contact the customer. If the traffic is not legitimate, the employee will block the customer's access.

Enforcement

Illegal robocalls and fraudulent spoofing are prohibited on Finger Lakes Communications Group, Inc.'s network. If it is determined that a Finger Lakes Communications Group, Inc. customer is using the network to fraudulently spoof calls or to originate illegal robocalls, Finger Lakes Communications Group, Inc. will either warn the customer to stop such practices and/or terminate their service as allowed per the terms of service.

Know Your Customer

Finger Lakes Communications Group, Inc. has procedures in place to prevent new and renewing customers from using the network to originate illegal robocalls. Finger Lakes Communications Group, Inc. thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services. Residential customers are asked to provide their full name, address (physical and mailing, if different), last four digits of their social security number, date of birth, phone number, and email as well as establish a security question and a password. Business customers are asked to provide their full name, address (physical and mailing, if different), tax identification number, phone number, and email, as well as establish a security question and a password. To initiate an account change, a customer must provide their password or the answer to their security question prior to initiating a change. If the customer is unable to provide that information, the customer service representative will call the customer back using the number they provided at account setup.

In addition, all end users agree to terms and conditions of service that prohibit use of Finger Lakes Communications Group, Inc.'s network for fraudulent or illegal purposes. If end users are found in violation of the terms of service, the end user's service may be suspended or terminated after an investigation.

Know Your Upstream Providers

Finger Lakes Communications Group, Inc. and its affiliate CRC know all the carriers with which they have agreements in place to exchange traffic. Finger Lakes Communications Group, Inc. and CRC have confirmed that all carriers they are connected to and exchange traffic with are listed in the Robocall Mitigation Database. Finger Lakes Communications Group, Inc. has also reviewed the connected carriers' RMPs to learn how the carriers monitor their originating traffic to mitigate illegal robocalls. Finger Lakes Communications Group, Inc. does not directly receive traffic from any foreign originating or intermediate provider. No provider is using Finger Lakes Communications Group, Inc.'s network to carry or process a high volume of illegal traffic onto the U.S. network. In addition, Finger Lakes Communications Group, Inc. is now incorporating traceback and prohibited traffic language in all new contractual agreements with upstream carriers.

Role In the Call Chain

Finger Lakes Communications Group, Inc. is a voice service provider with a STIR/SHAKEN implementation obligation on its network.

Traceback

Finger Lakes Communications Group, Inc. will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium fully and in a timely manner within twenty-four (24) hours.

Robocall Mitigation Database Eligibility

Finger Lakes Communications Group, Inc. has not been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling.

Finger Lakes Communications Group, Inc. has not been prohibited from filing in the Robocall Mitigation Database (RMD).

**Finger Lakes Communications Group, Inc.
Robocall Mitigation Plan – Addendum 1 – October 2024**

Parent and Affiliate Companies	Relationship to Filing Entity	OCN	FRN
Future Fiber Parent LP	Parent		0029860749
Future Fiber Holdings LLC	Parent		0029860715
Future Fiber FinCo LLC	Parent		0029860236
Otelco Parent, Inc.	Parent		
Otelco, Inc.	Parent		0022618441
Netspeed Holdings, Inc.	Affiliate		
Netspeed Parent, Inc.	Affiliate		
Lantek Fiber Optic Services, Inc.	Affiliate		
Lantek Communications NY, Inc.	Affiliate		
Icon Connections, Inc.	Affiliate		
Otelco Telecommunications LLC	Affiliate		0003741980
Pine Tree Telephone LLC	Affiliate	0020	0004997516
Saco River Telephone LLC	Affiliate	0022	0005555925
Mid-Maine Telecom LLC	Affiliate	3315	0017225723
CRC Communications LLC	Affiliate	236F (MA), 1255 (ME), 651D (NH)	0003713906
Mid-Maine TelPlus LLC	Affiliate		0021454806
Granby Telephone LLC	Affiliate	0036	0003731791
Netspeed LLC	Affiliate		0026646661
Shoreham Telephone LLC	Affiliate	0064	0020820189
War Telephone LLC	Affiliate	0258	0005057328
Otelco Mid-Missouri LLC	Affiliate	1917	0018538496
Hopper Telecommunications LLC	Affiliate	0300	0008702433
Otelco Telephone LLC	Affiliate	0312	0018538512
Blountsville Telephone LLC	Affiliate	0282	0006925440
Brindlee Mountain Telephone LLC	Affiliate	0283	0001775295
Trumansburg Telephone Company, Inc.	Affiliate	0131	0003412871
Ontario Telephone Company, Inc.	Affiliate	0112	0004315362
Netspeed Management, Inc.	Affiliate		0033445198

Company Officers with Management Responsibilities within Finger Lakes Communications Group, Inc.:

Richard Clark - President
Trina Bragdon - Secretary
Anna Reynolds – Treasurer

Finger Lakes Communications Group, Inc.
Robocall Mitigation Plan – Addendum 1 – October 2024

Board of Trustees:

Scott Baker
Jeffrey Butler
Jennifer Jun
Benjamin Diesbach
Frank Chiaino
Richard Clark
John Cinelli
Rachelle Chong
Paul Griswold