

Point Broadband Fiber Holding, LLC & Sunset Fiber, LLC
ROBOCALL MITIGATION PLAN

All voice traffic that originates on the Point Broadband Fiber Holding, LLC (Point Broadband) and Sunset Fiber, LLC (Sunset Fiber) (collectively, Company) network is subject to the following Robocall Mitigation Plan.

The Company has employed a multi-layered approach to address and mitigate illegal robocalling.

Company efforts include the following:

- Incorporation of robocall mitigation language into all documentation related to the voice service provided to customers prohibiting use of our networks to originate illegal/prohibited calls.
- Specifically, with respect to caller-ID, to require that the caller-ID value be either a number assigned to the calling party, or one which the caller has the explicit permission of the assignee to use.
- Company insists that our service provider partners implement these same practices and impose this same requirement on their partners, or face restrictions on their use of our platform (including, if necessary, complete loss of access).
- Company telephone service abuse mitigation practices are applied in a non-discriminatory manner.
- If Company discovers that traffic originally flagged as illegal is in fact legitimate, we will share that information with other parties in the call chain.
- Company vets each customer thoroughly, with additional scrutiny on customers involved with auto-dialed traffic types. Anonymous test accounts will not be provided to auto-dialers.
- Company employs real-time controls on traffic. All calls must have valid caller ID values, and for auto-dialed calls, each value must be checked against the list of numbers that customer provided and that Company staff vetted before establishing service. Each customer must have a calls-per-second limit commensurate with the traffic description provided.
- Company monitors the traffic moving through its network. CDRs are analyzed regularly by our internal technicians. The technicians inspect call durations to ensure that no auto-dialer traffic is being sent by customers that use Company's voice service. Company tracks call volumes and caller-ID utilization to spot changes indicative of illegal robocalls. Company verifies most-frequent Caller-IDs to identify any that are being misused.

- Company's third-party partner, Crosstel, uses Metaswitch's call analytics service to perform call analytics on inbound and outbound traffic to confirm the validity of the traffic before it exits or enters Company's network.
- Company knows the carriers from which it receives traffic and has confirmed that the carriers are listed in the Robocall Mitigation Database.
- Company monitors incoming traffic from connected carriers for suspicious call patterns indicative of illegal robocall activity. The connected carriers are made aware of any suspicious or illegal traffic identified and are notified that, if the traffic does not cease, the calls may be blocked from entering Company's network.
- No provider is using Company network to carry or process a high volume of illegal traffic.
- We require our internal technicians to check the Certificate Revocation List (CRL) as part of their routine compliance activities.
- Company updates the state Attorney Generals about potential additional solutions for combatting illegal robocalls.
- For voice residential products, Company makes available free, easy-to-use call blocking and labeling tools and regularly engages in easily understandable outreach efforts to notify customers about these tools. For all types of customers, Company implements network-level call blocking at no charge. We use best efforts to ensure that all tools offered safeguard customers' personal, proprietary, and location information.
- Company has a robocall mitigation notice on its website to educate customers on how Company is working to help protect customers from becoming a victim of unlawful robocalls and how to report the receipt of suspected illegal robocalls.
- Company uses best efforts to confirm the identity of new and renewing commercial voice customers by collecting information such as physical business location, contact person(s), state or country of incorporation, federal tax ID, and understanding the nature of the customer's business including if/how they will employ auto-dialers or other robocall style tools in the conduct of their business. Company also requires a photo ID for all new customers requesting voice service.
- We monitor, through our Regulatory Compliance Consultant, the efforts of the Federal Trade Commission and the Federal Communication Commission in regard to their robocall mitigation efforts, identification of industry trends, provision of consumer education materials, and other related information and alerts.

Enforcement

When non-compliant calls come to Company's attention through our internal mitigation analysis, we promptly investigate and take necessary action with the offending customer to mitigate ongoing illegal activity.

Traceback

Company commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our network to originate calls. Company will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium within 24 hours.

Company has identified a single point of contact in charge of responding to traceback requests and communicating and cooperating with state Attorney Generals about recognized scams and trends in illegal robocalling.

Company Information

Company Name	Relationship to Filing Entity	Type of Company	% Owned by Filing Entity	Management of Entity
Point Broadband Acquisition, LLC	Parent of Point Broadband Fiber Holding, LLC	Holding Co.	0%	Officers: Patricia Martin, CEO Chad Wachter, VP/GC/Secretary Nick DeWeese, CFO
Point Broadband Fiber Holding, LLC	Filer & Parent of Sunset Fiber, LLC	CLEC – Authority to Provide Competitive Local Exchange Telecom Services ETC - Eligible Telecom Carrier	Filing Entity	Board of Managers: Patricia Martin, CEO Chad Wachter, VP/GC/Secretary
Sunset Fiber, LLC	Filer & Subsidiary	CPCN - Certificate of Public Convenience and Necessity	100%	Board of Managers: Patricia Martin, CEO Chad Wachter, VP/GC/Secretary
Sunset Digital Communications, LLC	Subsidiary	CPCN - Certificate of Public Convenience and Necessity ETC - Eligible Telecom Carrier	100%	Board of Managers: Patricia Martin, CEO Chad Wachter, VP/GC/Secretary
Point Broadband of Opelika, LLC	Subsidiary	Limited Liability Company	100%	Board of Managers: Patricia Martin, CEO Chad Wachter, VP/GC/Secretary

Point Broadband of the Piedmont, LLC	Subsidiary	Limited Liability Company	100%	Board of Managers: Patricia Martin, CEO Chad Wachter, VP/GC/Secretary
Point Broadband of Ohio, LLC	Subsidiary	Limited Liability Company	100%	Board of Managers: Patricia Martin, CEO Chad Wachter, VP/GC/Secretary
Casair Broadband, LLC	Subsidiary	Limited Liability Company	100%	Board of Managers: Patricia Martin, CEO Chad Wachter, VP/GC/Secretary