

CONWAY CORPORATION

ROBOCALL MITIGATION PLAN

Consistent with FCC regulations,¹ Conway Corporation (“Conway”) submits this Robocall Mitigation Plan.

STIR/SHAKEN COMPLIANCE

Implementation Status. While we have not implemented the STIR/SHAKEN authentication framework on our network, all calls originating on our network are compliant with 47 CFR § 64.6301(b).

Extension. We rely on the continuing extension from STIR/SHAKEN implementation provided under 47 CFR § 64.6304(d) which exempts from STIR-SHAKEN Caller ID Authentication those portions of a voice service provider network that rely on technology that cannot initiate, maintain, carry, process, and terminate SIP.

Call Chain. We serve end-users as a voice service provider. We use Momentum Telecom, Inc., (“Momentum”) as our third-party switch vendor and voice service provider, and they are tasked with executing the STIR/SHAKEN protocol for our network.

Traceback Requests. We respond within 24 hours to all traceback requests from the Federal Communications Commission, law enforcement, and the industry traceback consortium, and cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls. We have designated a point of contact and that person’s name, title, address, phone number and email address are in the Robocall Mitigation Database portal.

Eligibility. We have not been prohibited from filing a certification in the Robocall Mitigation Database and do not have a history of enforcement actions for illegal robocalls, TCPA or TSR violations or related state law violations.

EFFORTS TO PREVENT ILLEGAL ROBOCALL TRAFFIC

Investigation and Enforcement. Calls originating from and terminating to our network and identified by us, Momentum or other means as suspicious or atypical are investigated to determine if illegal robocalling has occurred. If it is determined that a Conway customer is using our network to originate illegal robocalls, we will warn the customer to immediately stop such practices or terminate their service as allowed per Conway policy.

Know Your Customer – Commercial. We diligently verify the identities of new commercial customers by gathering essential information, including the physical address, contact individuals, federal tax identification, and an understanding of the customer’s business nature. This includes assessing whether and how they intend to use auto-dialers or similar robocall mechanisms in their operations. Our contracts and policies incorporate specific language aimed at mitigating

¹ 47 C.F.R. §§ 64.6303-6305.

robocalls, explicitly forbidding the use of our platforms for making or receiving unlawful calls. We conduct thorough evaluations of each customer.

Know Your Customer – Residential. We diligently verify the identities of new residential customers by gathering essential information, including name, physical address and social security number(s). Our contracts and policies incorporate specific language aimed at mitigating robocalls, explicitly forbidding the use of our platforms for making or receiving unlawful calls. We conduct thorough evaluations of each customer.

Risk Assessment. We are a voice service provider offering a variety of voice calling services. Our customers generally do not originate high volume calls and we have not received information suggesting that robocalls are originating on our network. Accordingly, we do not consider our network at high risk of originating illegal robocalls.

THIRD-PARTY PROVIDER

We have partnered with Momentum to provide voice services to our customers. Momentum maintains the primary role of the following functions to assist us in meeting network-based robocall mitigation compliance:

- Network Monitoring
- Traffic Management
- Knowing Upstream Providers
- Alerting of Robocall Activity
- Call Analytics

In addition to the above robocall mitigation steps, Momentum has a complete STIR/SHAKEN Implementation status and has fulfilled their own obligations with Robocall Mitigation Database Certification and Program filing.

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