

Douglas Services, Inc. dba Douglas Fast Net Robocall Mitigation Plan

This Robocall Mitigation Plan describes the specific reasonable steps that Douglas Services, Inc. dba Douglas Fast Net (“DFN”) 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

DFN has a “know-your-customer” policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. DFN interacts directly with each of its customers and all are locally based. Prior to a new business customer making a call on DFN’s network, we personally know, or get to know, the business owners and/or management. This personal touch gives DFN a clear view of whether or not the business is a risk for originating illegal robocalls.

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

In addition, DFN has implemented calling-number screening. Calls are dropped if a calling number that originates on our network is not owned by our customer and in use on our switch. Calling-number screening prevents malicious Caller ID spoofing which, in turn, prevents illegal robocalls.

“Know-Your-Upstream Provider” Procedures

DFN only accepts traffic from upstream providers that it also utilizes as a terminating carrier. DFN has signed, long-term contracts in place with its upstream providers which contain all contact information for the parties involved.

DFN would exercise due diligence before accepting traffic from any new upstream provider as we seek to ensure that such providers are not using DFN to carry or process a high volume of illegal traffic. Specifically, DFN would collect 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

DFN does not presently use any call analytics systems to identify and block illegal robocall traffic.

Commitment to Respond to Traceback Requests

DFN 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.