



MetroNet Systems Holdings, LLC ROBOCALL MITIGATION PLAN

MetroNet Systems Holdings, LLC (“MetroNet Systems Holdings”), on behalf of its wholly owned subsidiaries listed below (collectively, “Metronet”), has implemented this robocall mitigation plan to attempt to avoid illegal robocalls from originating on its network.

MetroNet Systems Holdings’ subsidiaries provide service as follows:

- Metro Fibernet, LLC (“Metro Fibernet”) is authorized to provide telecommunications services and other services in multiple states.
- CMN-RUS, LLC (“CMN-RUS”) is authorized to provide telecommunications services and other services in multiple states.
- Jaguar Communications, LLC (“Jaguar Communications”) is authorized to provide telecommunications services in Minnesota.
- Vexus Fiber, LLC (“Vexus Fiber”) is authorized to provide telecommunications services and other services in multiple states.
- U.S. Internet LLC¹ (“USI”) operates as a Voice over IP service provider in Minnesota.
- Climax Telephone LLC (“Climax Telephone”) operates as an incumbent local exchange carrier in Climax, Michigan.
- CTS Communications LLC (“CTS”) operates as a competitive local exchange carrier in Michigan.

The Disclosure of Corporate Structure for each subsidiary identified above is included in **Exhibit A** attached hereto.

Implementation of STIR/SHAKEN

MetroNet Systems Holdings has fully implemented STIR/SHAKEN in its subsidiaries’ networks of Metro Fibernet, CMN-RUS, Jaguar Communications, and USI. Each of these entities have fully implemented the STIR/SHAKEN authentication framework across their entire networks and all calls they originate comply with 47 CFR § 64.6301(a)(1) and (2).

MetroNet Systems Holdings has implemented STIR/SHAKEN in the IP portions of its subsidiaries’ networks of Vexus Fiber, Climax Telephone, and CTS. Each of these entities have implemented the STIR/SHAKEN authentication framework on the IP portions of their networks as required by 47 CFR § 64.6301(a)(1) and (2) and qualify for a continuing extension of the authentication requirement on the non-IP portions of their networks pursuant to 47 CFR § 64.6303(a)(2) and 64.6304(d). Vexus Fiber, Climax Telephone, and CTS still serve customers on the non-IP portions of their networks which rely on technology that cannot initiate, maintain, carry, process, and terminate SIP calls, and they participate in the ATIS Non-IP Authentication Task Force that is working to develop a non-internet protocol caller identification authentication solution.

¹ U.S. Internet LLC was formerly known as (and previously filed a robocall mitigation plan as) “US Internet Corporation.” The company was reorganized as a limited liability company and renamed in September 2025.



Know Your Customer Procedures

Subscriber Vetting: Metronet conducts reasonable due diligence on new and renewing customers to confirm the customer's identity, service address and, for a business, its incorporation documents and business reputation. These measures, which require a customer to provide sufficient information to ensure its legitimacy, also aid Metronet in "knowing its customers" and ensuring its services are not used by customers to originate illegal voice traffic. Service will not be provided if a new customer's identification cannot be verified.

Contractual Terms: Metronet requires all customers to accept its terms and conditions and acceptable use policy that prohibit customers from making unlawful calls, falsifying calling party identification information, and performing other illegal or improper acts over its service. In the event Metronet reasonably believes a customer is using its service for any unlawful purpose, including illegal robocalling or spoofing, Metronet may immediately discontinue a customer's service in accordance with the provisions in its terms and conditions and acceptable use policy.

Know Your Upstream Provider

Metronet knows all of its upstream providers and has insight into its upstream providers' policies and procedures related to identifying and blocking unlawful robocall traffic through Metronet's review of these providers' robocall mitigation certifications. Metronet also conducts reasonable due diligence before accepting traffic from upstream providers. As part of contractual arrangements, Metronet obtains information such as the voice service provider's physical business location, contact person(s), state or country of incorporation, and federal tax ID. In the event an upstream provider fails to address evidence that it has handed illegal robocalls to Metronet, Metronet will stop accepting traffic from such upstream provider. Metronet will only accept calls directly from voice service providers that are registered in the Robocall Mitigation Database (for example, it will not accept calls from service providers that have been de-listed pursuant to an enforcement action by the Commission).

Use of Call Analytics to Identify and Block the Origination of Illegal Robocalls

Metronet uses TNS Call Guardian, Inteliquent, Inc. d/b/a Sinch, and Equinix Information Systems' analytics, technologies, and services to monitor traffic on its network and identify potentially unlawful call origination activity. Metronet has deployed call authentication, call labeling, and call blocking services provided by TNS Call Guardian. Call treatment involves the routing of the call in the carrier's network based on the reputation score/category and STIR/SHAKEN authentication information. From the Call Guardian Authentication Hub, calls can be blocked, redirected, or more information can be delivered to the device. Negative Reputation TN reports identify telephone numbers with a negative reputation to enable Metronet to investigate and take appropriate action on unlawful robocallers. Sinch provides Metronet with a reputation score on its inbound and outbound traffic. Equinix detects usage anomalies indicative of fraud by implementing dynamic usage profiling. Metronet examines all alerts generated by Equinix. Metronet blocks calls originating from invalid numbers and calls from Do Not Originate ("DNO") databases by default. Metronet also offers call blocking and labeling tools to its residential customers and network-level call blocking at no charge.



Illegal robocalls and fraudulent spoofing are prohibited on Metronet's network. If Metronet is alerted to suspected unlawful robocall traffic originated by a Metronet customer, Metronet will conduct an investigation to identify the party that is potentially originating illegal robocalls. If it is determined a Metronet customer is using its network to fraudulently spoof calls or to originate illegal robocalls, Metronet will take action commensurate with the severity of the customer's offense, including, but not limited to, providing the customer with a warning or terminating the customer's service.

Cooperation with the Traceback Group, Law Enforcement, and Government Agencies

Metronet will respond to all traceback requests from the Commission, law enforcement, and the Industry Traceback Consortium ("ITG") within 24 hours and will cooperate with such entities in investigating and stopping any illegal robocallers that attempt to use Metronet's network to carry or process calls. Metronet will take the steps to effectively mitigate illegal traffic when it receives actual written notice of such traffic from the Commission through its Enforcement Bureau and will comply with the requirements of such notice and do so in accordance with the applicable FCC rules.



EXHIBIT A

Disclosure of Corporate Structure

This Robocall Mitigation Plan is applicable to the following service provider entity subsidiaries of MetroNet Systems Holdings, LLC (“Service Providers”):

Metro Fibernet, LLC
CMN-RUS, LLC
Jaguar Communications, LLC
Vexus Fiber, LLC
U.S. Internet LLC
Climax Telephone, LLC
CTS Communications, LLC

The business address for each Service Provider is:
11880 College Blvd., Suite 100, Overland Park, KS 66210

Parent Company:

The parent company of each Service Provider listed in the section above is:

MetroNet Systems Holdings, LLC
Address: 11880 College Blvd., Suite 100, Overland Park, KS 66210

Principals Exercising Management or Control:

The following is the list of principals exercising management or control for each Service Provider:

Dave Heimbach - President & Chief Executive Officer
Cole Hawks - EVP Corporate Development
Craig Cowden - EVP & Chief Technology Officer
John Campbell - EVP & General Counsel
Kyle Hamilton - EVP Construction
Sarah Overbaugh - Chief Financial Officer
Tracie Akers - Chief People Officer

Affiliates follow on the next page.

Exhibit A - Continued

Affiliates:

The following identifies the affiliates of each Service Provider²:

1. Metronet Infrastructure Manager, LLC;
2. SMM Sub, LLC,
3. Metronet Infrastructure Group, LLC
4. MetroNet Securitization Warehouse Holdings, LLC,
5. JKT Holdings LLC,
6. JKT Properties LLC
7. JKT Properties II LLC
8. MetroNet DevCo Parent, LLC,
9. Metronet Technologies, LLC,
10. Metronet Supply, LLC,
11. MetroNet Infrastructure Super Holdings, LLC,
12. MetroNet Associates, LLC,
13. Q-Comm IP, LLC,
14. MetroNet Securitization Warehouse Borrower, LLC,
15. Metronet Infrastructure Holdings, LLC,
16. Metro Fibernet, LLC
17. Jaguar Communications, LLC,
18. Vexus Warehouse, LLC,
19. Vexus Fiber, LLC,
20. U.S. Internet LLC,
21. Ridgeview LLC,
22. Metronet Infrastructure Issuer, LLC,
23. USI Wireless LLC,
24. Vexus Fiber Infrastructure, LLC,
25. CMN-RUS, LLC,
26. CTS Communications LLC,
27. Climax Telephone LLC.

Subsidiaries follow on the next page.

² Please note that each Service Provider is listed, but such entity is listed only as an affiliate to the other Service Providers.

Exhibit A - Continued

Subsidiaries:

Entity	Subsidiaries
MetroNet Infrastructure Manager, LLC	MetroNet Infrastructure Super Holdings, LLC Metronet Infrastructure Holdings, LLC Metronet Infrastructure Issuer, LLC Vexus Fiber Infrastructure, LLC CMN-RUS, LLC CTS Communications LLC Climax Telephone LLC
SMM Sub, LLC	MetroNet Associates, LLC
Metronet Infrastructure Group, LLC	Q-Comm IP, LLC
MetroNet Securitization Warehouse Holdings, LLC	MetroNet Securitization Warehouse Borrower, LLC Jaguar Communications, LLC Vexus Warehouse, LLC
MetroNet DevCo Parent, LLC	MetroNet DevCo Borrower, LLC Vexus Fiber, LLC Metro Fibernet, LLC U.S. Internet LLC Ridgeview LLC USI Wireless LLC