

PS Lightwave, LLC

Risk Management Plan (RMP)

For FCC Robocall Mitigation Database (RMD) Recertification

FCC Registration Number (FRN): 0020986626

Effective Date: February 12, 2026 (RMD Recertification)

1. Purpose and Scope

This Risk Management Plan (“RMP”) describes the policies, governance framework, and operational controls implemented by **PS Lightwave, LLC** (“PS Lightwave”) to comply with applicable Federal Communications Commission (“FCC”) requirements related to robocall mitigation, network reliability, and the accuracy of filings submitted to the Robocall Mitigation Database (“RMD”).

This RMP applies to PS Lightwave’s activities as a:

- Facilities-based Voice over Internet Protocol (VoIP) provider
- Competitive Local Exchange Carrier (CLEC)

2. Network Architecture and 911 Services

2.1 911 Service Model

PS Lightwave does **not originate 911 calls**.

911 traffic is relayed to an upstream service provider for routing and delivery to the appropriate Public Safety Answering Point (PSAP).

2.2 Redundancy and Resiliency

PS Lightwave has implemented network resiliency measures designed to reduce the risk of service disruption, including:

- Redundant interconnection paths to upstream service providers
- Dynamic routing controls designed to support automatic failover
- Alternative routing mechanisms intended to maintain service continuity in the event of an interconnection failure

These measures are intended to mitigate single points of failure and support continued access to emergency services.

3. STIR/SHAKEN Implementation

PS Lightwave has implemented the **STIR/SHAKEN** framework for IP-based voice traffic in accordance with FCC requirements.

3.1 Call Authentication

- PS Lightwave authenticates and signs outbound calls originating on its network.
- Call signing is performed using valid certificates issued by an authorized Certification Authority.

3.2 Third-Party Signing

- PS Lightwave does not rely on third-party or hosted call-signing services.
- Call authentication and verification are performed within PS Lightwave's network environment.

4. Robocall Mitigation and Fraud Prevention

PS Lightwave maintains robocall mitigation measures designed to identify, investigate, and mitigate potentially unlawful or suspicious calling activity, which may include:

- Monitoring call traffic patterns and volumes
- Identifying anomalous or high-risk behavior
- Applying thresholds and alerts to flag activity for review
- Implementing mitigation actions, up to and including suspension of service, where appropriate
- Blocking calls identified as likely illegal or spoofed

These measures are reviewed and adjusted as necessary to address evolving risks.

5. Traceback and Law Enforcement Cooperation

PS Lightwave maintains traceback capabilities and cooperates with lawful traceback and enforcement efforts, including:

- Responding to traceback requests within 24 hours
- Maintaining call detail records sufficient to support traceback investigations
- Cooperating with industry traceback groups and law enforcement agencies as required

6. Governance and Accountability

6.1 Roles and Responsibilities

- **FCC Compliance Owner:** Swen Wulf, Sr. Director of Engineering
- **Technical Contact:** Trace England, Director of VoIP Operations
- **Executive Certifier:** Rhonda Cook, Chief Executive Officer

The FCC Compliance Owner is responsible for oversight of RMD accuracy, recertification filings, and ongoing compliance with applicable FCC rules.

7. RMD Accuracy, Review, and Updates

PS Lightwave recognizes the FCC's enforcement focus on the accuracy and completeness of RMD filings.

To support compliance:

- RMD information is reviewed for accuracy prior to submission or recertification
- Updates are submitted when required based on material changes

7.1 Events Triggering RMD Review or Update

The RMD filing is reviewed and updated as appropriate following:

- Changes to upstream service providers
- Material network expansions or architectural changes
- Changes to 911 routing or delivery arrangements

8. CORES and Access Controls

PS Lightwave complies with FCC CORES requirements, including:

- Maintaining accurate FCC Registration Number (FRN) information
- Updating CORES records within required timeframes following changes
- Utilizing multi-factor authentication (MFA) for RMD access where required by the FCC

9. Recordkeeping

PS Lightwave maintains records related to:

- STIR/SHAKEN authentication activities
- Traceback requests and responses
- Robocall mitigation investigations
- RMD filings and confirmations

Records are retained in accordance with applicable FCC requirements and internal policies.

10. Contractual Prohibitions

10.1 Know your Customer

PS Lightwave's customer agreements prohibit the transmission of illegal robocalls over its network. Violations may result in service suspension or termination in accordance with applicable terms and conditions.

PS Lightwave has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. PS Lightwave thoroughly vets new customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services.

Customers are asked to provide their full name, address (physical and mailing, if different), tax identification number, phone number, email. To initiate an account change, a customer must provide their information 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.

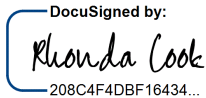
10.2 Upstream Provider Knowledge

PS Lightwave knows all the carriers from which it receives traffic and has confirmed that all the carriers are listed in the Robocall Mitigation Database. No provider is using PS Lightwave's network to carry or process a high volume of illegal traffic. PS Lightwave monitors incoming traffic from all connected carriers for suspicious call patterns indicative of illegal robocall activity. The connected carriers are made aware of any suspicious or illegal traffic and notified that, if the traffic does not cease, the calls may be blocked from entering PS Lightwave's network. In addition, PS Lightwave is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.

11. Ongoing Compliance

PS Lightwave is committed to ongoing compliance with FCC requirements, including:

- Periodic review of this RMP
- Appropriate staff awareness and training
- Updating this RMP as regulatory obligations or operational conditions change

Signed:  208C4F4DBF16434...

Rhonda Cook

Chief Executive Officer

PS Lightwave, LLC

Date: 2/16/2026