



29 North Central Avenue
Staunton, VA 24401

Robocall Mitigation Plan

MGW Telephone Company Incorporated (MGW), is a Service Provider, serving residential and business customers. All voice traffic on the MGW network is subject to the following parameters.

Know Your Customer

MGW has a long history of having a close relationship with each of its customers including understanding their needs and use for voice services.

New Customers

All new customers go through a verification process which includes personal identity verification for residential and business customers. Business and Enterprise Customers are processed with a thorough business identity check. Additionally, MGW seeks to understand each customer's use for all telecommunications services. MGW verifies customer information during the installation process for both Caller ID and CNAM.

Existing Customers

MGW requires signed updates on all renewals and additions by an authorized account holder to submitted or existing orders.

New and existing customers will receive informational material regarding Robocalls and legal ramifications associated with infractions.

Upstream Provider Knowledge

MGW knows the connected carriers it receives traffic from. MGW has reviewed the Robocall Mitigation Database to ensure these carriers have filed robocall mitigation plans to learn how they monitor their originating traffic to mitigate illegal robocalls. MGW monitors incoming traffic for suspicious call patterns that might indicate illegal robocall activity. If there is any suspicious or illegal traffic identified, the connecting carrier is notified. If the traffic does not cease or if traffic is from a carrier not listed in the Robocall Mitigation Database, then calls may be blocked from entering MGW's network. No carrier is using MGW's network to carry or process a high volume of illegal traffic.

Traceback

MGW coordinates and cooperates with traceback requests for law enforcement, carriers, and communication associations. To facilitate this process, MGW has implemented an upgraded Session Border Controller (SBC) and Call History Server (CHS) from Ribbon Communications.

Robocall Mitigation Plan Details

All lines can only dial out as the number designated to that specific voice line. Each line can only place one call at a time. VoIP lines have limited amounts of registrations. In addition to the above-mentioned SBC and CHS from Ribbon Communications, MGW will also have access to the Identity Hub Scoring and

Verification. This Scoring method determines the likelihood that a call should be blocked. A call could be blocked if:

- The originating Telephone Numbers shows up on a Do-Not-Originate list or is an unallocated, unused, or invalid number.
- Reasonable analytics indicated the call is highly likely to be illegitimate and malicious in intent.

MGW reserves the right to terminate service in the event of infringements on the Terms of Service.