

BERKELEY CABLE TELEVISION COMPANY INC ROBOCALL MITIGATION PLAN

Berkeley Cable Television Company Inc (Berkeley) OCN 712C is eligible for the continuing extension of the STIR SHAKEN implementation deadline on Non-IP networks as a small voice service provider (§64.6304 (a)(2) that has non-IP portions within its network §64.6304(d).

Berkeley provides local service to fewer than 100,000 voice subscriber lines. The majority of customers are served on the non-IP portions of Berkeley's network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

Consistent with § 64.6303 (a)(1), Berkeley is ready to upgrade its entire network to allow for the initiation, maintenance, and termination of SIP calls and fully implement the STIR/SHAKEN framework. Berkeley's non-IP network is connected to carriers that do not support IP connectivity, therefore, Berkeley cannot upgrade its Non-IP network to IP.

Berkeley has implemented the following Robocall Mitigation Plan to detect and prevent unlawful robocalls from originating on its network.

Berkeley has contracted with TNS (Call Guardian Solution) to provide robocall analytics and reputation scoring of our network's outbound traffic. The vendor's analytics identify patterns of suspected illegal robocalls and scores the calls based on their behavior and/or their status as suspected robocalls as reported to the Federal Communications Commission (FCC), Federal Trade Commission (FTC), and as reported by other carriers. Berkeley has access to the vendor's portal and receives notifications about telephone numbers originating suspected illegal robocalls on its network, including from unassigned, inactive and do-not-originate TNs. Berkeley will examine the reports and investigate and identify the source of the calls as unlawful or legitimate.

Know your Customer

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

Upstream Provider Knowledge

Berkeley knows all the carriers from which it receives traffic and has confirmed that all of the carriers are listed in the Robocall Mitigation Database. Berkeley monitors incoming traffic from all connected carriers for suspicious call patterns indicative of illegal robocall activity, notifies the upstream carriers of any such traffic and warns the carriers that if the traffic does not cease, the calls may be blocked from entering Berkeley's network. In addition, Berkeley is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.

Enforcement

If it is determined a Berkeley customer is originating prohibited unlawful robocalls on our network, Berkeley will either warn the customer to stop the behavior or terminate their service as

allowed per Berkeley's policies that define the circumstances by which Berkeley will suspend or terminate service to a customer.

Traceback

Berkeley is committed to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to originate calls. Berkeley commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within twenty-four (24) hours.

Ownership

The Principals of Berkeley Cable Television Company Inc dba Home Telecom are: Will Helmly is the President and serves as Chief Executive Officer of Berkeley Cable Television Company Inc dba Home Telecom, Anthony Douglas is Chief Operating Officer, Robert Meeker is Chief Financial Officer and Robert Edwards is Chief Growth and Experience Officer.

Will Helmly has Managing Control of Berkeley Cable Television Company Inc dba Home Telecom and all its affiliates and subsidiaries. The parent company of Berkeley Cable Television Company, Inc is Home Telephone Company, Inc..

Home Telephone Company, Inc. has 100% percentage ownership of Berkeley Cable Television Company, Inc and its affiliate Home Telephone ILEC, LLC.