

HARLAN COMMUNITY TELEVISION INC.

ROBOCALL MITIGATION PLAN

Harlan Community Television Inc. (“Harlan”) is a broadband provider that offers interconnected VoIP services to its subscribers on a resold basis. Harlan’s wholesale VoIP provider is Momentum Telecom, Inc. (“Momentum”), a provider of wholesale and retail VoIP and other communications services across the United States.

While Harlan necessarily relies on the robocall mitigation policies, procedures, and safeguards instituted by Momentum, Harlan has also adopted this robocall mitigation plan to take its own measures to limit the potential for the origination of unlawful robocalls by its customers that would be carried and processed by Momentum and other downstream providers.

Know-Your-Customer Policies

Subscriber Vetting: Harlan vets the identity of its customers when approving an application and entering into a contract for telephone service. As part of this vetting process, Harlan collects the customer’s legal name and address, physical location, and contact information, and, for commercial customers, federal tax ID, and Harlan may require additional information to validate the customer. In some instances, Harlan also utilizes third-party agencies for additional information regarding the credit and/or fraud risk associated with a potential customer. Harlan’s services are provided to fixed locations using its own network and services are typically installed on location by its personnel, so Harlan knows the actual location of its customers. All of this information enables Harlan to validate the identity of potential customers prior to provisioning of service. Harlan will not provide service if a new customer’s identification cannot be verified.

Contractual Terms: Harlan’s VoIP Subscription Agreement prohibits the use of Harlan’s service for any unlawful or fraudulent purpose. The terms provide that Harlan may disconnect the service if Harlan determines, in its sole judgment, that a customer’s use of the service violated the Subscription Agreement.

Use of Call Analytics to Identify and Block Unlawful Traffic

Harlan relies on Momentum’s use of call analytics systems to identify and block unlawful robocall traffic as set forth in Momentum’s robocall mitigation plan on file with the FCC. Momentum reports that the call analytics it employs for Harlan’s traffic can detect call patterns that indicate robocall activity, including, but not necessarily limited to, an unusual large number of calls from the same number, an excessive number of short duration calls, and calls that stop attempting to connect after a single ring, and calling numbers that are invalid, unallocated, or on the Industry Traceback Group’s Do Not Originate (“DNO”) list.

If Harlan receives a report or alert from Momentum of suspected unlawful robocall traffic originated by a Harlan end user customer, Harlan will conduct an investigation. To the extent a customer is found to have violated Harlan’s Subscriber Agreement, Harlan 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 without notice.

Knowledge of Upstream Providers

Harlan's upstream provider, Momentum, is a well-known, reputable wholesale service provider that is registered in the FCC's Robocall Mitigation Database. Harlan does not itself have knowledge or insight into the upstream providers from which Momentum receives traffic, but understands from Momentum's mitigation plan that Momentum's direct upstream connections are with service providers that similarly have represented to the FCC that they have policies and procedures to identify and block unlawful robocall traffic.

Cooperation with the Traceback Group, Law Enforcement and Government Agencies

Harlan is committed to responding fully and within 24 hours to all traceback requests made by the Industry Traceback Group ("ITG"), law enforcement authorities, and government agencies to investigate and address suspected unlawful robocalls originated by Harlan customers.

Harlan is also committed to cooperating with Momentum on traceback requests and to fully complying with the Commission's robocall blocking requirements. Harlan understands that Momentum will block all calls and provider traffic that: (1) are identified in any public notice or order released by the FCC; (2) are substantially similar to the types of traffic identified in any public notice or order released by the Commission; or (3) include a caller ID number or name that is on DNO list issued by ITG.