

Robocall Mitigation Plan

Surf Air Wireless, LLC d/b/a Surf Internet (“Surf”) is headquartered in Elkhart, Indiana and has been offering fiber and fixed wireless high speed internet access service and Wi-Fi to residential and business customers in Indiana, Illinois and Michigan since 2002. Surf also provides Voice Over Internet Protocol (“VoIP”) services as a reseller of white-labeled services offered by Alianza, Inc. (“Alianza”). Surf does not control the softswitch, number porting or call trunking for the associated calls. Accordingly, Surf does not have the facilities necessary to implement STIR/SHAKEN. Surf’s origination provider Alianza fully implements STIR/SHAKEN and attests ALL voice calls made from the Surf network. Surf has, however, adopted this robocall plan to establish procedures to limit the potential for originating, carrying, or processing unlawful robocalls through its voice services.

Surf certifies it has not been prohibited from filing in the Robocall Mitigation Database and Surf has not been subject to any Commission, law enforcement, or regulatory agency action or investigation arising from suspected unlawful robocalling or spoofing.

In accordance with 47 CFR § 64.6305(e), Surf has designated a point of contact to receive notice of illegal robocall traffic or other robocall mitigation-related issues. That person’s name, title, address, phone number and email are available in the Robocall Mitigation Database.

PROCEDURES TO MITIGATE OR STOP ROBOCALLS

I. Know Your Customer

Surf in partnership with Alianza, follows the North American Numbering Council (“NANC”) Call Authentication Trust Anchor Working Group guidelines and best practices for vetting caller’s identity [Best Practices for the Implementation of Call Authentication Frameworks](#). Surf confirms the identity of all of its customers including, but not limited to (i) contract person(s); (ii) business location, (iii) state or country of incorporation, (iv) federal tax identification; and (v) nature of our customer’s businesses throughout the customer’s service period.

II. Contractual Terms

Customers using Surf’s services agree to abide by the rules and regulations set forth in our “Acceptable Use Policy” and “Internet Terms and Conditions” Policies ([Acceptable Use Policy](#) and [Terms of Use for Services Agreement](#)). Surf’s Acceptable Use Policy and Terms of Use Agreement expressly prohibit customers/subscribers from engaging in illegal activity, creating a false Caller ID (i.e., spoofing) or robocalling.

Customers are informed that any suspicious activity will be investigated; and if the customer is engaging in, or has engaged in illegal robocalling, their service will be terminated.

III. Traceback Requests

Surf commits to respond fully to all traceback requests from the Commission, law enforcement, and the Registered Traceback Consortium within 24 hours. In the unlikely event illegal robocallers use Surf’s system to originate calls, Surf will cooperate with such entities’ investigation.

IV. Robocall Mitigation

Surf’s underlying voice provider, Alianza, has committed to fully complying with Commission’s robocall blocking requirements and has confirmed that it 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 ITF. Alianza also blocks the traffic of all foreign providers and gateway providers that have not registered in the Robocall Mitigation Database.

V. Know Your Upstream Provider

Surf has an agreement in place with Alianza to resell Alianza's VoIP offering to Surf's customers. Surf has confirmed that Alianza is listed in the Robocall Mitigation Database and Alianza has "Know Your Upstream Provider" provisions in place.

VI. Network Monitoring (Call Analytics Systems)

Surf's end-user services are subject to network monitoring that monitors against illegal robocalls such as high call volumes and high call duration. Designated employees review all flagged call patterns and actively resolve issues as quickly as possible. For whatever reason, if the end-user is uncooperative, Surf will implement mitigation activities not limited to suspension or termination of service.

Alianza also has implemented a proprietary fraud detection and mitigation process that analyzes high-volume network traffic to evaluate compliance. Alianza utilizes a variety of fraud detection indicators and fraud prevention best practices. Calls from the Surf network are routed through to Alianza to verify and certify calls. Alianza also takes remedial action to prevent or remediate robocalling or other fraudulent activity it detects on its customers' systems.

If Surf's upstream provider Alianza determines the call did not originate from Surf, the call will not be certified and will fail.

VII. Plan Updates

Surf will continue to monitor industry best practices and review internal processes to ensure our systems adapt to address the ongoing challenges affecting this industry.

ATTACHMENT TO SURF AIR WIRELESS, LLC ROBOCALL MITIGATION PLAN

PRINCIPALS OF SURF AIR WIRELESS, LLC

Gene Crusie	CEO, Director
Ryan Delack	CFO, Director

AFFILIATES AND SUBSIDIARIES OF SURF AIR WIRELESS, LLC

Surf Air Wireless, LLC (“Surf”) has no subsidiaries.

Surf’s direct parent is MNW Intermediate Holdco, Inc. (“MNWIH”), an Indiana corporation, which holds 100% of the equity and voting interests in Surf. MNWIH also holds 100% of the equity and voting interests in the following companies, making each of these companies affiliates of Surf:

- MNW Telecom, Inc., an Indiana corporation
- High Speed Connect Michigan, LLC, a Delaware limited liability company
- High Speed Connect Indiana, LLC, a Delaware limited liability company
- High Speed Connect Illinois, LLC, a Delaware limited liability company

PARENT COMPANIES TO SURF AIR WIRELESS, LLC

As noted above, MNWIH holds 100% of the equity and voting interests in Surf.

High Speed Internet Services, Inc., a Delaware corporation, holds 100% of the equity and voting interests in MNWIH.

Surf Air Wireless Holdings, LLC (“SAW Holdings”), a Delaware limited liability company, holds 100% of the equity and voting interests in High Speed Internet Services, Inc.

FiberCo Holdings I, LP (“FiberCo”), a Delaware limited partnership, holds 100% of the equity and voting interests in SAW Holdings.

- The general partner of FiberCo is FiberCo Holdings I GP, Inc., a Delaware corporation.
 - The sole shareholder of FiberCo Holdings I GP, Inc. is Bain Capital Credit Member, LLC, a Delaware limited liability company, the sole member and Managing Director of which is Jonathan S. Lavine, a U.S. citizen.
- The limited partners in FiberCo are (1) Bain Capital Credit FiberCo Holdings, L.P. (“BCCFH”), (2) Bain Capital Credit FiberCo Holdings II, L.P. (“BCCFH II”), and (3) other minority limited partners each holding an indirect equity interest of less than 10% in Surf.
- BCCFH and BCCFH II are, in turn, owned by investment funds ultimately controlled by Mr. Lavine.