



Mark Twain Communications Company

Robocall Mitigation Plan

This Robocall Mitigation Plan describes the specific reasonable steps that Mark Twain Communications Company ("Mark Twain") has taken to avoid the origination, carrying, or processing of illegal robocall traffic on its network.

Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Robocalls

Mark Twain has a "know-your-customer" policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. Mark Twain vets new and renewing customers through the request for identification information on our application. This includes but is not limited to: (1) applicant name; (2) billing address; (3) service address; (4) tax identification number; (5) date of birth; and (6) type of services requested. Mark Twain further vets its business customers by confirming that their business is registered on the Missouri Secretary of State's website.

Although Mark Twain's customers generally do not generate a high volume of calls, were Mark Twain to receive a request for high-volume origination services, we would exercise caution and extensively investigate such customers before granting access to the services.

"Know-Your-Upstream Provider" Procedures

Most of the connections that Mark Twain has with upstream providers have been in place for many years, and we know these companies very well. However, Mark Twain exercises due diligence before accepting traffic from any new upstream provider as we seek to ensure that such providers are not using Mark Twain to carry or process a high volume of illegal traffic. Specifically, Mark Twain collects information such as the upstream provider's physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of their business.

Use of Call Analytics Systems

Mark Twain utilizes reporting functionality provided by our billing vendor, Mid America Computer Corporation, to identify and evaluate abnormal calling patterns within call detail records. In the event anything is detected, Mark Twain will reach out to the responsible party to resolve the problem. If Mark Twain were to determine that a customer was using our network to originate illegal robocalls, we would advise them to

stop immediately. If the customer did not heed that warning, Mark Twain would not hesitate to terminate their service.

Commitment to Respond to Traceback Requests

Mark Twain commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its services to originate, carry, or process illegal robocalls.