



Atlantic Telephone Membership Corporation
Atlantic Seawinds Communications, LLC
Atlantic Telecom Multimedia Consolidated, LLC
Robocall Mitigation Program

Purpose

This Robocall Mitigation Plan describes the specific reasonable steps that Atlantic Telephone Membership Corporation, a fixed voice provider, Atlantic Telecom Multimedia Consolidated, LLC, a fixed voice provider, and Atlantic Seawinds Communications, LLC, an MVNO reseller(jointly, "FOCUS Broadband"), have 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

FOCUS Broadband has a "know-your-customer" policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. FOCUS Broadband vets the identity of new residential and business customers. Specifically, we require new and renewing customers to provide valid identification, so that their identity can be confirmed, as well as a social security number, so that a credit check can be performed. In addition, FOCUS Broadband requires business customers to provide an Employer Identification Number (EIN).

Virtually all of FOCUS Broadband's business customers are physically located in our service territory and most are small businesses that do not generate a high volume of calls. Consequently, FOCUS Broadband has never received a request for high-volume origination services. However, were we to receive such a request, we would exercise caution and extensively investigate the requesting entity before granting access to the services. Specifically, FOCUS Broadband would collect information such as their physical business location, contact person(s), state or country of incorporation, federal tax ID, and the general nature of their business.

FOCUS Broadband's Customer Terms and Conditions Agreement states that its voice services cannot be used for any illegal, abusive, or fraudulent purposes and, in particular, the "making of nuisance calls" constitutes cause for cancellation of services. FOCUS Broadband would not hesitate to enforce this policy if necessary.

"Know-Your-Upstream Provider" Procedures

Atlantic Telephone Membership Corporation and Atlantic Telecom Multimedia Consolidated, LLC, FOCUS Broadband's fixed voice providers, have a limited number of connections with upstream providers. These agreements have been in place for many years, and we have longstanding relationships with the carriers that route traffic on

our network. FOCUS Broadband's fixed voice providers exercise due diligence before accepting traffic from any new upstream provider as we seek to ensure that such providers are not using FOCUS Broadband to carry or process a high volume of illegal traffic. Specifically, FOCUS Broadband's fixed voice providers collect 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.

Atlantic Seawinds Communications, LLC relies on the "Know-Your-Upstream Provider" procedures and practices of the underlying MVNO, Zefcom, LLC (d/b/a Telispire).

Use of Call Analytics Systems

Atlantic Telephone Membership Corporation and Atlantic Telecom Multimedia Consolidated, LLC, FOCUS Broadband's fixed voice providers, utilize robocall mitigation solutions from Neustar in both the IP and non-IP portions of their network. These solutions include call validation, traffic monitoring, and subscriber alerts for suspicious calls. Neustar monitors traffic that originates on FOCUS Broadband's network, and we are notified if suspected illegal robocalling activity is detected. FOCUS Broadband then has the ability to block the traffic and/or terminate the customer's services if it is determined that the traffic is related to illegal robocalling.

In addition, Neustar will block incoming calls to FOCUS Broadband's fixed voice customers if they are from any service provider that is not registered in the Robocall Mitigation Database.

Atlantic Seawinds Communications, LLC relies on the network monitoring and analytics procedures and practices of the underlying MVNO, Zefcom, LLC (d/b/a Telispire).

Commitment to Respond to Traceback Requests

FOCUS Broadband 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 illegal robocallers that use its services to originate, carry, process illegal robocalls.