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FCC Required Process Supplement



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FirstLight FCC Required Process Supplement

The following is a guide for FirstLight corporate activities required to be documented and followed to comply with FCC regulations.

These policies are subject to change as recommendations and regulations evolve over time, FirstLight reserves the right to update this Policy as conditions warrant.

Complying with the FCC Traced ACT

The Federal Communications Commission (FCC/Commission) adopted rules requiring voice service providers to implement STIR/SHAKEN caller ID authentication technology in the Internet Protocol (IP) portions of their networks.

The FCC requires that all providers certify in the Robocall Mitigation Database that they have fully implemented STIR/SHAKEN or have instituted a Robocall Mitigation program to ensure that they are not originating illegal robocalls.

The Commission requires voice service providers to develop a Robocall Mitigation plan that:

- details the reasonable steps taken to avoid originating illegal robocalls
- demonstrates a commitment to respond to traceback requests to cooperate with investigating and stopping illegal robocalls
- is filed in the Robocall Mitigation Database.

The Commission stated that a Robocall mitigation program is sufficient if the detailed practices in the plan can “reasonably be expected to significantly reduce the origination of illegal robocalls and the voice service provider complies with the practices it describes in its filings.”

FirstLight Corporate Information

FirstLight Fiber Inc. is a Delaware corporation. Its primary Address is provided within the Robocall Mitigation Database.

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

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FirstLight Position Statement

FirstLight is dedicated to Stopping illegal calls from originating in our network and will follow all FCC regulations to mitigate illegal calls. Our robocall Mitigation plan is one part of that effort. We also will cooperate with other carriers and regulatory bodies and law enforcement to eliminate illegal calls on our network.

Robocall Mitigation Plan

The FirstLight Robocall Mitigation Plan is a set of processes that are part of our standard business practice. It incorporates on-boarding new customers and ensuring we know our customer. It incorporates telephone number management and ensuring customers are using only numbers they should rightly use. It includes monitoring calling patterns for calls our clients make. It includes investigation and traceback on reported abuse or illegal calling from our network.

We Know Our Customers

All services provided by FirstLight are covered under contractual terms and conditions. Customers are made aware of our terms and that we do not allow illegal use of our services. Violations of the rules and regulations in the Traced Act would be consider violation of the terms of our service. All of our customers are vetted through our internal onboarding process. We collect information on the customers business including, but not limited to:

1. Physical Locations of Operations
2. Contact persons
3. Tax ID
4. Nature of business
5. Type of calling expected, including a forecast of inbound and outbound calling

We Know Our Upstream Providers

All upstream provider services used by FirstLight are covered under contractual terms and conditions. All our upstream providers have implemented Stir Shaken and have Robocall Mitigation plans in place and published on the FCC website. Violations of the rules and regulations in the Traced Act by our upstream providers would be considered violation of the terms of our contracts with those providers.

FirstLight will accept calls directly from a voice service provider only if that voice service provider's filing appears in the Robocall Mitigation Database and that filing has not been de-listed pursuant to an enforcement action by the Commission.

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Telephone Number Management

FirstLight Manages a significant pool of directory numbers. FirstLight reports our usage in bi-annual reporting to the Pooling Administrator. We maintain a number database for numbers we own and numbers our customers port to us. We provide Toll Free service and manage and maintain that number inventory as well. We take directory number management seriously and work with other carriers to ensure LNP rules and schedules are followed.

Customers that port numbers to us from other carriers go through the LNP process, and this ensures only the numbers they own can be activated in our switches. Numbers we provide customers are numbers we own and manage through the Pooling Administrator. Toll free numbers we provide are through carriers we work with directly or directly through us using our Resporg ID and SOMOS.

For the purposes of this plan, a Telephone Number (TN)-based caller identity is defined as the originating phone number included in call signaling used to identify the caller, for call screening purposes, that is uniquely associated with a subscriber. All TN used for caller identity must be associated with the subscriber's account. This is the ANI and is always provided by FirstLight. Caller ID is provided either by FirstLight or directly by the end user customer. Our Stir Shaken implementation will attest to both calls based upon the fact we can verify the ANI. However, only calls that we provide the Caller ID will have an attestation level of 'A', all calls that an end user provides Caller ID will have an attestation level of 'B'. FirstLight understands there are reasons for our clients to want to provide a Caller ID that will direct a called party to contact them at their desired number, and that the desired number may not be the ANI. This is considered a valid Caller ID. For Example: Companies may provide a Toll Free number as Caller ID so customers returning calls will be handled in the most efficient way for both the calling and called party.

If we receive information that a customer is spoofing a number in their Caller ID that is not approved or permitted, we investigate with our end user customer and report back to the party that notified us of their concern that there is abuse, or illegal Caller ID spoofing.

Monitoring

FirstLight uses solutions from Equinox Information Systems to monitor calling patterns. These tools provide daily analytics and reporting. First used for Billing Mediation and Fraud Prevention, Equinox tools are leveraged for Robocall Mitigation. Our monitoring solutions combine numbering expertise with behavioral analytics to identify unauthorized and suspicious use of phone numbers and detect trends and anomalies in calling patterns. Our STIR/SHAKEN implementation ensures unauthenticated calls

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receive proper call treatment. FirstLight continues to evaluate options to improve our response using vendor supplied Robocall Mitigation Solutions.

Investigation and Traceback

FirstLight follows ITG-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, FirstLight will dedicate sufficient resources to provide prompt and complete responses to traceback requests. FirstLight will investigate suspicious activity found by its monitoring systems or reported to FirstLight by consumers or third parties. The investigation could potentially result in opening a traceback request or with FirstLight contacting a subscriber to correct improper use of the platform, or, if the subscriber or subscriber's End-User does not respond or comply, to block their use of the platform.

In addition, FirstLight will respond to all traceback requests from the Commission, law enforcement, and the Industry Traceback Consortium ("ITG") within 24 hours and will cooperate with such entities in investigating and stopping any illegal robocallers that attempt to use FirstLight's network to carry or process calls.

Traceback Contact Information

Name	Title	Contact Information
Brent Hartigan	Manager - Toll Fraud	bhartigan@firstlight.net
David Brassett	Manager - Voice Engineering	dbrassett@firstlight.net
Robert Erwin	Sr. Director Core Network Engineering	rerwin@firstlight.net

Blocking

If FirstLight's monitoring systems identify suspected robocalling patterns that are confirmed with further investigation, FirstLight will take appropriate action up to and including suspension or termination of the subscriber's or End-User's use of FirstLight's network.

Plan Updates

This plan and industry's best practices must evolve to respond to the dynamic nature of mitigating illegal robocalling. FirstLight will monitor industry best practices and continuously improve our internal processes to ensure this plan and our systems adapt to this ever-changing issue. In the event of any material change to this Plan, FirstLight will republish it and file such an update to the FCC Robocall Mitigation Database within 10 days of such update.

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Attachment A.

Operating Company Numbers covered by this Robocall Mitigation Plan

Entity	LATA	OCN
OXFORD NETWORKS	120	5205
Freedom Ring	120	512F
Freedom Ring	122	8468
Freedom Ring	128	681B
TVC	133	7989
TVC	134	7989
OTEL	122	9827
National Mobile Communications Corp	124	3454
FLTG	138	629E
Primelink Inc.	134	0065
Finger Lakes Technology Group Inc - PA	226	464H
Finger Lakes Technology Group Inc - PA	234	464H
Finger Lakes Technology Group Inc - PA	228	464H
Finger Lakes Technology Group Inc - PA	232	464H
Finger Lakes Technology Group Inc - PA	138	464H
Finger Lakes Technology Group Inc - PA	230	464H
Finger Lakes Technology Group Inc - PA	924	464H

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Revision/Review History:

Revision /Review	Date	Description of changes	Requested By	Revision By
1	06/23/2021	Initial Release	Security Board	Stephen Bond
2	06/24/2021	Review and updated	Security Board	Mary Burgess
3	06/29/2021	Updated Contacts	David Brassett	Stephen Bond
4	02/26/2024	Updated to meet 2/26/2024 requirements	FCC	Stephen Bond
5	02/18/2025	Updated Contacts and company address	David Brassett	Robert Erwin
6	02/10/2026	Update Attachment A and contacts	David Brassett	Robert Erwin