

GUADALUPE VALLEY COMMUNICATIONS SYSTEMS, LP.

ROBOCALL MITIGATION PLAN

This Robocall Mitigation Plan describes the specific reasonable steps that Guadalupe Valley Communications Systems LP (“GVCS”) 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

GVCS has a “know-your-customer” policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. Specifically, for new and renewing customers, GVCS:

- Confirms the customer’s identity and, if it is a business, its incorporation documents.
- Confirms the customer’s service address.
- Verifies the customer’s credit history and business reputation.
- Verifies customer information when contracts are renewed or services are added.
- Verifies the customer’s identity and their right to use the telephone number presented on calls.

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

In addition, GVCS has policies that define the circumstances by which it will deny, suspend or terminate service to a customer.

“Know-Your-Upstream Provider” Procedures

Most of the connections that GVCS has with upstream providers have been in place for many years, and we know these companies very well. GVCS has confirmed that all of the upstream providers that it receives traffic from are listed in the Robocall Mitigation Database. GVCS has also reviewed the upstream providers’ robocall mitigation plans to learn how they monitor the traffic they carry to mitigate illegal robocalls.

GVCS exercises due diligence before accepting traffic from any new upstream provider as we seek to ensure that such providers are not using GVCS to carry or process a high volume of illegal traffic. Specifically, GVCS 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

GVCS uses Transaction Network Services (TNS) Call Guardian analytics technologies and services to monitor traffic on its network and identify potentially unlawful call origination activity. If GVCS has a reasonable basis to believe that a customer is originating illegal robocalls, it will require the customer to remedy the problem. If effective action is not taken, GVCS will suspend and/or terminate service to the customer.

GVCS blocks the following types of calls by default:

- Calls that purport to be from invalid, unallocated, or unused numbers.
- Calls from phone numbers on a Do-Not-Originate list.

Commitment to Respond to Traceback Requests

GVCS 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.