

IAMO Communications, Inc ROBOCALL MITIGATION PROGRAM

IAMO, Operating Company Numbers 1206,4401, is eligible for the continuing extension of the STIR SHAKEN implementation deadline on Non-IP networks as a small voice service provider (§64.6304 (a)(2) that has non-IP portions within its network §64.6304(d).

IAMO provides local service to fewer than 100,000 voice subscriber lines. The majority of customers are served on the non-IP portions of IAMO's network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

The carriers to which IAMO is connected do not support IP connectivity at this time; therefore, IAMO cannot upgrade the non-IP portions of its network to IP.

Robocall Mitigation Program

All voice traffic that originates on IAMO's network is subject to the following Robocall Mitigation Program.

Call Analytics

IAMO has contracted with JSI, LLC for its Robocall Origination Detection Service. JSI downloads IAMO's CDRs and look for patterns indicative of originating robocalls. JSI provides IAMO a report identifying the suspected illegal robocall activity for investigation.

Investigation

IAMO investigates calls identified by JSI as suspicious calls or those that have abnormal call volumes, patterns or activity consistent with illegal robocalls.

In addition, if IAMO has any other reason to suspect illegal robocalling or spoofing is taking place over its network, IAMO will work internally to identify the party that is using our network to originate, route, or terminate such calls and take appropriate action.

Enforcement

Illegal robocalls and fraudulent spoofing is prohibited on our network. If it is determined a IAMO customer is using our network to fraudulently spoof calls or to originate illegal robocalls, IAMO will either warn the customer to stop such practices or terminate their service as allowed per IAMO policy.

Know your Customer

IAMO has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. IAMO thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services.

Upstream Provider Knowledge

IAMO knows all the carriers from which it receives traffic and has confirmed that all of the carriers are listed in the Robocall Mitigation Database. In addition, IAMO is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.

Traceback

IAMO commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to originate calls. IAMO commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within twenty-four (24) hours.

Principals, Affiliates, Subsidiaries, and Parent Companies

IAMO Communications, Inc is the Parent Company of each entity listed below. James Quimby is the President of IAMO Communications, Inc and all the Subsidiaries listed below:

First Fiber Corporation - Subsidiary of IAMO Communications, Inc.

Missouri Stateline Communications - Subsidiary of IAMO Communications, Inc

Iowa Stateline Communications - Subsidiary of IAMO Communications, Inc.

Corporate Officers and Governance Structure

IAMO Communications, Inc.

The duly appointed Officers of IAMO Communications, Inc. are as follows:

- Merlin Swanson, President
- Danny Evans, Vice President
- Ryan Kinsella, Secretary
- Russell Adkins, Treasurer

The Board of Directors consists of the following individuals:

- Nathan Larabee, Director
- Rick Apperson, Director
- James Quimby, Director

John Shelton serves as Chief Executive Officer (CEO) of IAMO Communications, Inc. Mr. Shelton maintains managing control over IAMO Communications, Inc., including all affiliates and subsidiaries