



STIR/SHAKEN Robocall Mitigation Plan Description for Sacred Wind Communications, Inc. ("Sacred Wind")

1. Sacred Wind is a Small Service Provider, serving fewer than 100,000 voice service subscriber lines with both IP and TDM-based technology.
2. Sacred Wind has taken the following specific steps to combat caller ID spoofing and improve call authenticity traffic from new or renewing customers:
 - a. Sacred Wind uses TransNexus ClearIP as a trusted third party in the certification, management, and verification of identity tokens used in the STIR/SHAKEN framework.
 - i. Sacred Wind uses STIR/SHAKEN tokens for all outbound calls using TransNexus ClearIP's APIs, ensuring the authenticity of caller identity.
 - ii. TransNexus ClearIP's services have been integrated for the management of STIR/SHAKEN certificates, maintaining their validity.
 - iii. TransNexus ClearIP's call authentication services has enabled the verification of incoming calls by checking the validity of STIR/SHAKEN tokens.
3. Sacred Wind commits to respond within 24 hours to all trace back requests from the Commission, law enforcement, and industry trace back consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.
4. Sacred Wind has taken the following specific steps to detect originating robocall traffic from new or renewing customers:
 - a. Sacred Wind uses the Metaswitch Call Guardian Authentication Hub (CGAH) system to monitor our phone traffic for unusual and/or illegal activity. Call Guardian Authentication Hub (CGAH) is a hosted, managed service provided by Metaswitch in conjunction with Transaction Network Services (TNS). Sacred Wind is using the Data Insights & Robocall Mitigation, Universal Call Block, and Advanced Call Treatment services from the CGAH suite of products.
 - i. TNS Call Guardian is an industry leading call analytics solution that uses cross-carrier real-time call events combined with crowdsourced data to create accurate and comprehensive reputation profiles differentiating legitimate users of telecommunications services from abusive, fraudulent, and unlawful users. The service provides access to a dynamic data set of negatively scored telephone numbers within the Call Guardian Data Analytics Engine. Call treatment is determined within the Call Guardian Authentication Hub (CGAH). Based on the resulting score of the call, various options are available – whether to block, redirect, or provide a warning to the subscriber.
 - ii. Call Guardian uses a complex machine learning algorithm and various data sources to identify robocalls, differentiate between wanted and unwanted calls, identify spoofing events, and identify with certainty which calls should be blocked.
 - iii. Specifically in the Call Guardian web interface, the Negative Reputation TN report identifies customer telephone numbers with a negative reputation. The report will allow Sacred Wind to take action to inhibit bad actors on our network. Negatively scored telephone numbers may be submitted for Reputation Redress, as appropriate.
 - iv. The Universal Call Block (UCB) service enables Sacred Wind to block calls at the network level in accordance with the respective telecommunication mandates, rules and/or regulations.
 - v. The Advanced Call Treatment (ACT) service allows the call to be redirected to a voicemail/announcement rather than ringing the customer's device for calls from numbers with negative reputation scores.
 - vi. Utilizing the tools included in CGAH, Sacred Wind can differentiate between legal robocalls and illegal robocalls originating on our network by categorizing/rating the originating number appropriately.
 - b. Sacred Wind is contracted with Mid America Computer Corporation (MACC), which provides our billing services. MACC helps Sacred Wind identify illegal robocalling specifically for long distance and international calls originating on our network by alerting us to abnormal calls/charges and identifying new or renewing subscribers generating this activity.
 - i. When potential illegal long distance and/or international call activity is detected by MACC, they notify Sacred Wind via email about the abnormal activity, including detailed call information including originating subscriber number, date and time of call activity, and call duration. This allows Sacred Wind to

analyze the call data and make a decision on whether the call activity was illegal robocalling or normal activity and take appropriate action if necessary.

5. Sacred Wind has taken the following steps to prevent illegal originating robocalling traffic from new or renewing customers:
 - a. The Sacred Wind Business Office Customer Sales & Service Representatives (CSSR's) are responsible for gathering all of the pertinent information for any and all new commercial VoIP customers to comply with the Sacred Wind Robocall Mitigation Policy. Installation of VoIP services will not be approved until the following conditions are met:
 - i. All pertinent information is collected, verified and entered into our customer management system, which includes the physical legal business address, contact person(s), federal Tax Identification Number (TIN), and the general nature of the customer's business.
 - ii. Customer agrees to follow the Sacred Wind Robocalling Mitigation Policy.
6. Sacred Wind has taken the following steps to mitigate illegal originating robocalling traffic from new or renewing customers upon detection:

Upon detection of illegal VoIP activity, a Sacred Wind Business Office CSSR will notify the customer by contacting them via voice according to the Sacred Wind Robocalling Mitigation corporate policy. The CSSR will enter notes into our customer management system which includes the date and time of contact, the name of the business contact person they spoke with, and the nature and frequency of the illegal activity. The CSSR will explain the Sacred Wind Robocalling Mitigation Policy to the customer verbally and will also provide a copy of the full policy to the customer via email or mailed copy.

Do Not Originate

Pursuant to 28 U.S.C. § 1746, that the telephone number(s) referenced in my STIR/SHAKEN filing did not originate any of the calls associated with the unlawful, fraudulent, or otherwise unauthorized activity described in the accompanying complaint. Any call that appears to have originated from this number was made without the knowledge, consent, or authorization of the lawful subscriber and constitutes unlawful caller ID spoofing in violation of the Truth in Caller ID Act (47 U.S.C. § 227(e)) and the Federal Communications Commission's implementing rules at 47 C.F.R. § 64.1604.

Pursuant to FCC requirements governing caller ID authentication and robocall mitigation under the STIR/SHAKEN framework (47 C.F.R. § 64.6300 et seq.), I affirm that the legitimate subscriber or owner of the number did not place, direct, permit, authorize, or otherwise participate in any of the calls in question. Any such call traffic is the result of misuse by an unauthorized third party and is inconsistent with the obligations imposed on

ATN International, Inc.

Freedom 3 Investments IV, LP

Alaska Communications Systems Holdings, Inc. ACS of Alaska, LLC

ACS of the Northland, LLC

ACS of Fairbanks, LLC

ACS of Anchorage, LLC

ACS Long Distance, LLC

Alaska Communications Internet, LLC

ACS Cable Systems, LLC

ACS Cape Newenham ES Acquisition, LLC

ACS Indian Mountain ES Acquisition, LLC

ACS of the Northland License Sub, LLC

ACS of Anchorage License Sub, LLC

ACS of Fairbanks License Sub, LLC

ACS Sparrevohn ES Acquisition, LLC

ACS Wireless License Sub, LLC

ACS Long Distance License Sub, LLC

Northstar License Corporation

Atlantic Teleconnection Operating Company Limited Bermuda Digital Communications Ltd.

Choice Communications LLC

Commnet AZ LLC

Commnet Four Corners LLC

Commnet of Arizona LLC

Commnet of Nevada LLC

Commnet of Nevada, Subco

Commnet Rural America, LLC

Commnet Wireless, LLC

EssexTel Inc.

Excomm LLC

GTT, Inc.

Innovative Long Distance, Inc.

Logic Communications Ltd.

Mora Valley Wireless LLP

NTUA Wireless, LLC

Sacred Wind Communications, Inc.

Sal Spectrum, LLC

SW DinehN et, LLC

SW Telesolutions, Inc.

Virgin Islands Telephone Corporation

VITELCOM Cellular Inc.

WestNet Nevada LLC

WestTel Limited

Entity Details: Name	Affiliation Details: Name	Affiliation Details: Role	Affiliation Details: Title
Bermuda Digital Communications Ltd.	Niall Sheehy	President	President
Bermuda Digital Communications Ltd.	Kimberley Caines	Secretary	Secretary
Bermuda Digital Communications Ltd.	Jeanene Patrice Stovell	Assistant Secretary	Assistant Secretary
Bermuda Digital Communications Ltd.	Mary M. Mabey	Assistant Secretary	Assistant Secretary
Cedar Cable Ltd.	Niall Sheehy	President	President
Cedar Cable Ltd.	Kimberley Caines	Secretary	Secretary
Cedar Cable Ltd.	Jeanene Patrice Stovell	Assistant Secretary	Assistant Secretary
Cedar Cable Ltd.	Mary M. Mabey	Assistant Secretary	Assistant Secretary
Commnet Wireless, LLC	Michele A. Satrowsky	Assistant Treasurer	Assistant Treasurer
Commnet Wireless, LLC	Brad W. Martin	President	President
Commnet Wireless, LLC	Mary M. Mabey	Assistant Secretary	Assistant Secretary
Commnet Wireless, LLC	Carlos Doglioli	Treasurer	Treasurer
Commnet Wireless, LLC	James Ellison	Assistant Treasurer	Assistant Treasurer
Commnet Wireless, LLC	Neo Nicolaou	General Manager	General Manager
EssexTel, Inc.	Edward Dement	President	President
EssexTel, Inc.	Richard Bosler	Other	Vice President, Carrier Services
EssexTel, Inc.	Mary M. Mabey	Secretary	Secretary
EssexTel, Inc.	Michele A. Satrowsky	Assistant Treasurer	Assistant Treasurer
EssexTel, Inc.	Carlos Doglioli	Treasurer	Treasurer
Logic Communications Ltd.	Kimberley Caines	Secretary	Secretary
Logic Communications Ltd.	Patrice Stovell	Assistant Secretary	Assistant Secretary
Logic Communications Ltd.	Mary M. Mabey	Secretary	Secretary
NTUA Wireless, LLC	Mary M. Mabey	Secretary	Secretary
NTUA Wireless, LLC	Velen Tsosie	Other	General Manager
Sacred Wind Communications, Inc.	Terry Clark	Assistant Treasurer	Assistant Treasurer
Sacred Wind Communications, Inc.	Michele A. Satrowsky	Assistant Treasurer	Assistant Treasurer
Sacred Wind Communications, Inc.	Andrew Fienberg	Assistant Treasurer	Assistant Treasurer
Sacred Wind Communications, Inc.	Brad W. Martin	President	President
Sacred Wind Communications, Inc.	Mary M. Mabey	Assistant Secretary	Assistant Secretary
Sacred Wind Communications, Inc.	Carlos Doglioli	Assistant Treasurer	Assistant Treasurer
Sacred Wind Communications, Inc.	Neo Nicolaou	General Manager	General Manager
SW DinehNet, LLC	Terry Clark	Assistant Treasurer	Assistant Treasurer
SW DinehNet, LLC	Michele A. Satrowsky	Assistant Treasurer	Assistant Treasurer
SW DinehNet, LLC	Andrew Fienberg	Assistant Treasurer	Assistant Treasurer
SW DinehNet, LLC	Brad W. Martin	President	President
SW DinehNet, LLC	Mary M. Mabey	Assistant Secretary	Assistant Secretary
SW DinehNet, LLC	Neo Nicolaou	General Manager	General Manager
Virgin Islands Telephone Corporation	Brad W. Martin	President	President
Virgin Islands Telephone Corporation	Michele A. Satrowsky	Assistant Treasurer	Assistant Treasurer
Virgin Islands Telephone Corporation	Domenic C. Micale	Assistant Treasurer	Assistant Treasurer
Virgin Islands Telephone Corporation	Carlos Doglioli	Treasurer	Treasurer
Virgin Islands Telephone Corporation	Paul Kouroupas	Secretary	Secretary
Virgin Islands Telephone Corporation	Mary M. Mabey	Assistant Secretary	Assistant Secretary
Virgin Islands Telephone Corporation	Siobhan James-Alexander	Chief Executive Officer	Chief Executive Officer
Virgin Islands Telephone Corporation	Darragh Dolan	Chief Financial Officer	Chief Financial Officer
WestTel Limited (d/b/a Logic)	Niall Sheehy	Vice-President	Vice-President
WestTel Limited (d/b/a Logic)	Mark Reynolds	Secretary	Secretary