

CND Acquisition Corp. d/b/a Peachtree Broadband Fiber
ROBOCALL MITIGATION PLAN

CND Acquisition Corp. d/b/a Peachtree Broadband Fiber (“CND”) is a service provider that offers interconnected VoIP services to its subscribers on a resold basis. CND’s wholesale VoIP provider is Momentum Telecom, Inc. (“Momentum”), which is registered in the Robocall Mitigation Database with a complete STIR/SHAKEN implementation.

CND relies on Momentum for its network/VoIP calling features. Momentum provides all the voice services: porting, phone numbers, and all routing of incoming and outgoing calls. While CND necessarily relies on Momentum’s robocall mitigation policies, procedures, and safeguards, CND has also adopted this robocall mitigation plan to take its own measures to limit the potential for the origination of unlawful robocalls by its customers that would be carried and processed by Momentum and other downstream providers.

Know-Your-Customer Policies

Subscriber Vetting: CND vets the identity of its customers when approving an application and entering into an agreement to provide telephone service. CND’s services are provided to fixed locations and services are installed on location by its personnel, so CND knows the actual location of its customers. As part of this vetting process, CND visits each location where service will be provided and collects the customer’s legal name and address and other contact information. CND verifies a residential customer’s identity with a driver’s license or other government-issued identification, and verifies business customers by collecting their EIN. This information enables CND to validate the identity of potential customers prior to provisioning of service. Service will not be provided if a new customer’s identification cannot be verified.

Contractual Terms: CND’s terms of service require that:

- a) Customers shall not impersonate any person on the system or communicate under a false name or a name that Customer is not entitled or authorized to use, including that customers may not falsify calling party identification information.
- b) Customers shall not participate or use their accounts in any way to make fraudulent offers of products, items or services.
- c) Customers shall not use the system to send unsolicited advertising, promotional material or other forms of unwanted solicitation, except in areas on-line specifically designated for such communications.
- d) Customers shall not perform any activity which constitutes a fraudulent act or criminal offense.

CND may terminate a customer’s service for violations of the AUP its terms

Use of Call Analytics to Identify and Block Unlawful Traffic

CND relies on Momentum's use of call analytics systems to identify and block unlawful robocall traffic as set forth in its robocall mitigation plans on file with the FCC. Momentum reports that its call analytics can detect call patterns that indicate robocall activity, including, but not necessarily limited to, an unusual large number of calls from the same number, an excessive number of short duration calls, and calls that stop attempting to connect after a single ring, and calling numbers that are invalid, unallocated, or on the Industry Traceback Group's Do Not Originate ("DNO") list.

If CND receives a report or alert from Momentum of suspected unlawful robocall traffic originated by an CND end user customer, CND will conduct an investigation. To the extent a customer is found to have violated terms, CND will take action commensurate with the severity of the customer's offense, including, but not limited to, providing the customer with a warning or terminating the customer's service without notice. CND's agreement with Momentum requires CND to terminate services to any customer engaging in or failing to cooperate in stopping illegal robocalling activity.

Knowledge of Upstream Providers

CND's upstream provider Momentum is a well-known, reputable wholesale service provider that is registered in the FCC's Robocall Mitigation Database. CND does not itself have knowledge or insight into upstream providers from which Momentum receives traffic, but understands from its mitigation plans that its direct upstream connections are with service providers that similarly have represented to the FCC that they have policies and procedures to identify and block unlawful robocall traffic.

Cooperation with the Traceback Group, Law Enforcement and Government Agencies

CND is committed to responding fully and within 24 hours to all traceback requests made by the Industry Traceback Group ("ITG"), law enforcement authorities, and government agencies to investigate and address suspected unlawful robocalls originated by CND customers. CND's agreement with Momentum requires CND's prompt response to any requests for cooperation with tracebacks from a traceback administrator authorized by the ITG, Momentum, or any applicable law enforcement or regulatory authority without requiring a subpoena or other formal demand or request.

CND is also committed to cooperating with its wholesale providers on traceback requests and to fully complying with the Commission's robocall blocking requirements. CND understands that its wholesale providers will block all calls and provider traffic that: (1) are identified in any public notice or order released by the FCC; (2) are substantially similar to the types of traffic identified in any public notice or order released by the Commission; or (3) include a caller ID number or name that is on DNO list issued by ITG.