

PNG TELECOMMUNICATIONS, INC.

Robocall Mitigation Program

October 2024 Version

I. Robocall Mitigation Program Introduction

The following Robocall Mitigation Program (“RMP”) details the policies and practices that PNG Telecommunications, Inc. d/b/a Powernet (“PNG” or “Company”) is adopted to prevent unlawful robocalls from originating on, terminating to, or routing through PNG’s voice network.

A. Company Summary

PNG Telecommunications, Inc. was founded in 1992 by focusing on selling long distance services to business customers. PNG's offering and workforce grew quickly, adapting to technology advances and now offers managed services, internet, data, wireless and voice services to residential and business customers. PNG’s OCN number is 3395, 3435 and 002C.

B. Implementation of STIR/SHAKEN

In accordance with FCC rules referenced below, PNG only accepts traffic from providers that at a minimum satisfy the following requirements:

- Accepting traffic from domestic Voice Service Providers. In accordance with 47 C.F.R § 64.6305(g)(1), PHS accepts calls directly from a domestic Voice Service Provider only if that Voice Service Provider's filing appears in the RMD and that filing has not been de-listed pursuant to an enforcement action.
- Accepting traffic from Foreign Voice Service Providers or Foreign Intermediate Providers. In accordance with 47 C.F.R § 64.6305(g)(2), PHS accepts calls from Foreign Voice Service Providers or Foreign Intermediate Providers that use NANP resources that pertain to the U.S. in the caller ID field to send voice traffic to residential or business subscribers in the U.S., only if that foreign provider’s filing appears in the RMD in accordance with paragraph and that filing has not been de-listed pursuant to an enforcement action.
- Accepting traffic from Gateway Providers. In accordance with 47 C.F.R § 64.6305(g)(3), PHS accepts calls directly from a Gateway Provider only if that Gateway Provider's filing (a) appears in the RMD, (b) shows that the Gateway Provider has affirmatively submitted the filing, and (c) has not been de-listed pursuant to an enforcement action.
- Accepting traffic from Non-Gateway Intermediate Providers. In accordance with 47 C.F.R § 64.6305(g)(4), PHS accepts calls directly from a Non-Gateway Intermediate Provider only if that Non-Gateway Intermediate Provider’s filing (a) appears in the RMD, (b) shows that the Non-Gateway Intermediate Provider has affirmatively submitted the filing, and (c) has not been de-listed pursuant to an enforcement action.

PNG’s Know Your Upstream Provider procedure involves checking the RMD to see if the

Provider's filing (a) appropriately appears in the RMD, (b) shows that the provider has submitted the applicable filing, and (c) has not been de-listed pursuant to an enforcement action.

II. Certification

Company, by submitting this RMP, hereby certifies that (a) all calls originating on its network are subject to this RMP which satisfies the FCC's requirements, (b) to its knowledge, the Commission has not taken any formal action to remove any prior certification of the Company, and (c) PNG (including any parent and affiliates) has not been prohibited from filing in the Robocall Mitigation Database ("RMD") by the Commission. PNG (and any parent, affiliate or any entity that shares common ownership, management, directors, or control) has not been the subject of any formal Commission law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient RMD certification or RMP description.

III. Traceback Cooperation

PNG will cooperate in traceback investigations. To allow for timely and comprehensive law enforcement efforts against illegal robocallers, PNG will dedicate sufficient resources to provide prompt and complete responses to traceback requests from law enforcement and from US Telecom's Industry Traceback Group. PNG has identified a single point of contact in charge of responding to these traceback requests and will respond to traceback requests as soon as possible or within 24 hours.

PNG respond to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls.

IV. Implementing Knowing Your Customer and Monitoring PNG's Traffic

The FCC requires that a Voice Service Provider's RMP "describe with particularity" its robocall mitigation techniques as follows: (1) a Voice Service Provider must describe how it is meeting its existing obligation to take affirmative, effective measures to "know its customers" and prevent new and renewing customers from originating illegal calls; and (2) Voice Service Provider must describe any "know-your-upstream provider" procedures in place designed to mitigate illegal robocalls. To comply with the requirements to describe their "new and renewing customer" and "know-your-upstream provider" procedures, such providers must describe any contractual provisions with end-users or upstream providers designed to mitigate illegal robocalls.

PNG has partnered with Sansay, Inc. ("Sansay") to optimize our efforts in monitoring our outbound voice traffic in real-time to prevent the origination of illegal robocalls. Sansay is the leading provider of cloud-ready, high-performance, scalable software-based VoIP and WebRTC session control infrastructure. The Sansay software provides detailed reporting, identifies

suspected illegal robocalls and alerts us if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has been flagged for poor reputation. We immediately investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If we determine that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as appropriate.

As part of the vetting process, PNG collects information such as physical location, contact person(s), and for small businesses, the nature of the customer's business, among other things. Doing so is necessary to provide a prompt response to traceback requests and enforcement efforts.

With these measures and procedures along with those discussed herein, below, PHS takes "affirmative, effective measures to (1) prevent new and renewing customers from using its network to originate illegal calls, including knowing its customers and exercising due diligence in ensuring that its services are not used to originate illegal traffic" and (2) know its upstream providers.

V. Requiring Contractual Provisions to Mitigate Illegal Robocalls

In satisfaction of the FCC's requirements that a provider "know its customers" procedures, PNG has revised its Acceptable Use Policy to include the following language:

Prohibited Uses. Permitted use of the Service does not include certain activities including, but not limited to autodialing, robocalling, transmitting any material that contains viruses, time bombs, trojan horses, worms, malware, spyware, or any other programs that may be harmful or dangerous, spoofing, continuous or extensive call forwarding, continuous connectivity, fax broadcast, fax blasting, polling, transmitting any material that may infringe, misappropriate, or otherwise violate the foreign or domestic intellectual property rights or other rights of third parties, telemarketing (including without limitation charitable or political solicitation, junk faxing, fax spamming, calling/faxing any person through the use of distribution lists or otherwise who has not given specific permission to be included in such a process) or any other activity that would be inconsistent with reasonable business usage.

Customer further agrees not to transmit any material that encourages conduct that could constitute a criminal offense, violate the intellectual property rights of others, give rise to civil or criminal liability or otherwise violate any applicable local, state, national or international statute, regulation, or other law. Customer hereby acknowledge and agree to abide by the terms of the FCC's Declaratory Ruling (CG Docket No. 23-362) dated February 8, 2024 whereby the FCC clarified that calls made with AI-generated voices are "artificial" under the Telephone Consumer Protection Act which means that voice cloning technology used in common robocall scams targeting consumers is illegal. Applicable law includes, as applicable, the Telephone Consumer Protection Act and the Telemarketing Sales Rule, the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act, the Truth in Caller ID Act, the Junk Fax Act, the CAN-SPAM Act, similar state laws, state laws regarding privacy and data subject rights, and the requirements of the Payment Card Industry Data Security Standard.

PNG's Terms of Service and Acceptable Use Policy are available at <https://www.powernetco.com/legal>.

VI. Validating Customer's Right to Use Telephone Numbers

When PNG establishes service to a retail end user voice customer, PNG confirms the end user customer has a verified association with the telephone numbers it uses for its originating telephone calls. In this connection, PNG either assigns the telephone numbers to its VoIP end user customers or ports an existing end user's customer telephone number on to PNG's network.

As discussed above, PNG partners with Sansay to detect patterns consistent with or specific to illegal robocalls (including large bursts of traffic in small timeframes, low duration subscriber traffic and sequential dialing patterns, or call pattern that is consistent with illegal robocalls), or if it otherwise has good reason to suspect illegal robocalling or illegal spoofing is taking place over its network, PNG will seek to identify the party that is using its network to originate, route, or terminate these calls and take appropriate action. PNG may take such actions including, but are not limited to, initiating a traceback investigation; verifying that the originating customer owns or is authorized to use the Caller ID number; determining whether the Caller ID name sent to a receiving party matches the customer's name, trademark, or d/b/a name; reviewing complaints; suspending or terminating the party's ability to originate, route, or terminate calls on its network; and notifying law enforcement authorities.

VII. Designating an Employee Responsible for Addressing Robocall Mitigation-Related Issues

To further ensure PNG's network is not utilized for the origination, termination, or routing of unwanted and illegal robocalls, PNG provides the following name, title, department, business address, telephone number, and email address of the individual within PNG that leads PNG's team that handles robocall mitigation-related issues:

Contact Name:	Holly Nagel
Contact Title:	Routing & Rate Analysis
Contact Department:	Carrier Managment
Contact Street Address:	8805 Governor's Hill Drive, Suite 163
Contact City State and Zip Code:	Cincinnati, Ohio 45249
Contact Telephone Number:	(513) 645-4775
Contact Email:	stirshaken@powernetco.com

VIII. Employee Training and Updates to PHS's RMD Submission

PNG has implemented a training program that focuses on ensuring that personnel receive appropriate training on issues related to illegal robocalls. The Company agrees to update its submission in the RMD within ten (10) business days of any change to the applicable information it must provide and update in the RMD.