

FBN Indiana, Inc.

301 N Washinton St., P O Box 461 Hebron IN 46341

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Robocall Mitigation Program

This Robocall Mitigation Plan describes the specific reasonable steps that FBN Indiana, Inc. has taken to avoid the origination, carrying, or processing of illegal robocall traffic. FBN Indiana plays two roles in the call chain. It is (1) a facilities-based voice service provider, and (2) a non-facilities based reseller of long distance service (non-gateway intermediate provider). In FBN Indiana's role as long distance reseller, the Company's wholesale network provider is Lumen.

Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Robocalls

FBN Indiana has a "know-your-customer" policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. Prior to a new business customer ever making a call on FBN Indiana's network, we personally know, or get to know, the business owners and/or management. This personal touch gives FBN Indiana a clear view of whether or not the business is a risk of originating illegal robocalls. Although FBN Indiana's business 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, FBN Indiana's contracts with business customers contain provisions which allow for service termination in the instance that FBN Indiana's services are used for illegal purposes, such as illegal robocalling. FBN Indiana would not hesitate to enforce these contract terms if its services were abused.

"Know-Your-Upstream Provider" Procedures

Most of the connections that FBN Indiana has with upstream providers have been in place for many years, and we know these companies very well. However, FBN Indiana exercises due diligence before accepting traffic from any new upstream provider as we seek to ensure that such providers are not using FBN Indiana to carry or process a high volume of illegal traffic. Specifically, FBN Indiana 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.

In its role as a non-gateway intermediate provider, FBN Indiana only offers long distance service to the local voice service customers of FBN Indiana, and its parent company, Northwestern Indiana Telephone Company, Ind. DBA NITCO. Therefore, in its role as a long-distance service

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provider, FBN Indiana knows very well the only upstream providers from which it receives traffic.

Use of Call Analytics Systems

FBN Indiana has implemented the TransNexus Clear IP robocall monitoring solution. This product verifies that all outgoing calls pass a reputation test to ensure that the originating party has not been reported or flagged as a source of unwanted calls. ClearIP processes a file of customer usage with suspicious calling patterns every day. FBN Indiana reviews this file every business day to check for numbers that are originating calls that are suspect. In review, FBN Indiana verifies if the originating customer is using this auto dialer for legitimate reasons, such as a pharmacy, school or doctor's office. If a customer was found to be originating illegal and/or unwanted robocalls, calls from that originating number would be blocked.

In its role as a non-facilities based reseller of long distance service, FBN Indiana relies, in part, on the call analytics systems of its wholesale provider, Lumen.

Commitment to Respond to Traceback Requests

FBN Indiana 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 any illegal robocallers that use its services to originate, carry, or process illegal robocalls.