

VIRGINIA EVERYWHERE, LLC D/B/A ALL POINTS BROADBAND

ROBOCALL MITIGATION PLAN

Virginia Everywhere, LLC d/b/a All Points Broadband (“APB” or the “Company”) is a broadband provider that offers interconnected Voice over Internet Protocol (“VoIP”) services to its subscribers on a resold basis. APB currently purchases VoIP services on a resold basis from Momentum Telecom, Inc. (“Momentum”). Momentum is a provider of wholesale and retail VoIP and other communications services across the United States.

While APB necessarily relies on the robocall mitigation policies, procedures, and safeguards instituted by Momentum as APB’s wholesale provider, APB 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 as its wholesale provider (and other downstream providers).

Know-Your-Customer Policies

Subscriber Vetting: APB follows the North American Numbering Council (“NANC”) Call Authentication Trust Anchor Working Group guidelines and best practices for vetting the identity of its customers when approving an application for service and entering into a contract with a customer for said service.¹ As part of this vetting process, APB collects the customer’s legal name and address, physical business location, contact information, and, for commercial customers, state or country of incorporation and federal tax ID. APB also confirms the nature of the customer’s business. All of this information allows APB to identify the customer across APB’s services and may also be provided to third-party agencies to determine the credit and/or fraud risk associated with the customer. If APB cannot validate the customer based on the initial information provided, APB may require additional information to validate the customer. APB will not provide service if a new customer’s identification cannot be verified.

Contractual Obligations: Customers using APB’s VoIP services agree to abide by the rules and regulations listed in APB’s terms of service (the “Service Terms”).² The Service Terms expressly prohibit the use of APB’s VoIP service for any unlawful purpose, including, but not limited to, modifying the customer’s caller ID, auto-dialing, continuous or extensive call forwarding, telemarketing, fax or voicemail broadcasting or fax or voicemail blasting, or in any way that is

¹ See NANC Call Authentication Trust Anchor Working Group, Best Practices for Terminating Voice Service Providers Using Caller ID Authentication Information, https://nanc-chair.org/docs/CATA_Report_Best_Practices_for_Terminating_VSPs_using_Caller_ID_Authentication_Information_Feb_2022.pdf

² See All Points Broadband, Voice over Internet Protocol Service Addendum (All Customers Other Than FTTH Customers in Virginia), <https://allpointsbroadband.com/legal/voice-over-internet-protocol-service-addendum/>; All Points Broadband, Residential Service Terms and Conditions Agreement (FTTH Customers in Virginia), <https://allpointsbroadband.com/legal/residential-service-terms-and-conditions-agreement/>.

threatening, abusive, harassing, defamatory, libelous, deceptive, fraudulent, invasive of another's privacy, or any similar behavior. Customers are also informed that, to the extent they are found to have violated their contractual obligations for the reasons noted previously or any other reason, APB will take action commensurate with the severity of the customer's offense, including, but not limited to, terminating the customer's service without notice and/or forwarding the relevant communications and other information (including the customer's identity), to the appropriate authorities for investigation and prosecution.

Use of Call Analytics to Identify and Block Unlawful Traffic

APB relies on Momentum's use of call analytics systems to identify and block unlawful robocall traffic as set forth in the company's robocall mitigation plan on file with the FCC.

Momentum reports that the call analytics it employs can detect call patterns that indicate robocall activity, including, but not necessarily limited to, an unusually 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 ITG's DNO list.

To the extent APB receives a report or alert from Momentum of suspected unlawful robocall activity by an APB customer, APB will conduct an investigation. To the extent an APB customer is found to have violated APB's Service Terms, APB will take action commensurate with the severity of the customer's offense, including, but not limited to, terminating the customer's service without notice and/or forwarding the relevant communications and other information, to the appropriate authorities for investigation and prosecution.

Knowledge of Upstream Providers

Because APB offers its VoIP services on a resold basis via Momentum's wholesale services, APB does not itself have knowledge or insight into the upstream providers from which it receives traffic. However, Momentum is a well-known, reputable wholesale service provider and is registered in the FCC's Robocall Mitigation Database. APB understands through Momentum's publicly available robocall mitigation plan that Momentum knows the upstream providers from which they receive traffic and has insight into their respective upstream providers' policies and procedures related to identifying and blocking unlawful robocall traffic, through Momentum's review of their respective providers' publicly available robocall mitigation plans.

Cooperation with the Traceback Group, Law Enforcement and Government Agencies

APB is committed to responding fully and within 24 hours to all traceback requests made by ITG, law enforcement authorities, and government agencies to investigate and address suspected unlawful robocalls originated by APB customers.

In connection with the above, APB is also committed to working with Momentum on traceback requests and complying with the Commission's robocall blocking requirements. APB understands that Momentum 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.