



ROBOCALL MITIGATION PLAN

As a voice service provider and ISP, WhiteSky Communications, LLC, a RealPage company, is committed to cooperating with the Federal Communications Commission (FCC) in preventing and mitigating illegal robocalls. This document describes our Robocall Mitigation Plan (RMP) and the specific measures implemented by WhiteSky Communications to prevent and mitigate robocalls in compliance with 47 CFR § 64.6305.

- **USER VERIFICATION (Know Your Customer)**

During our Sales and Onboarding process, WhiteSky Communications follows a comprehensive procedure to familiarize ourselves with every customer.

Our business model is focused exclusively on domestic, US-based Multi-Family Dwelling (MDU) customers, avoiding high-risk telecom client categories with complex ownership, or those located internationally. WhiteSky Communications primarily sells voice services to its existing customers, with whom it has enjoyed long relationships. We believe this further lowers the risk of any robocall activities originating on WhiteSky Communications' network.

- **TRACEBACK REQUESTS**

WhiteSky Communications is fully committed to cooperating with the FCC and law enforcement to investigate and stop illegal Robo-callers that use our service by responding to all such traceback requests within 24 hours. In the event of an investigation, we abide by all rules protecting customer proprietary network information under 47 USC 222 and 47 CFR 64.2001-2011. If WhiteSky Communications determines that the identified traffic is not illegal, WhiteSky Communications shall provide the Enforcement Bureau with an explanation as to why WhiteSky Communications reasonably concluded that the identified traffic is not illegal, and what steps it took to reach that conclusion.

WhiteSky Communications utilizes a combination of internal tools and third-party solutions to check for Do Not Originate (DNO) numbers. In addition, WhiteSky utilizes a combination of internal tools and third-party solutions to detect invalid phone number formats, area codes and unassigned number blocks.

In accordance with 47 CFR 64.6305(e), WhiteSky Communications has designated a point of contact to receive notices of illegal robocall traffic or other robocall mitigation related issues, including traceback requests.

Designated RMD Contact:

RealPage Unified Communications
voiceucservices@realpage.com



2201 Lakeside Blvd
Richardson, TX 75082

- **OBSERVATION**

WhiteSky Communications investigates any identified suspicious calls on its outbound traffic to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls. If necessary, we block robocalls on that network pursuant to 47 CFR 64.1200(k), as directed to do so by the Commission. WhiteSky Communications has contractually partnered with third parties, Inteliquent Inc. and Peerless Network Inc., to manage its incoming voice traffic under a STIR/SHAKEN compliant framework.

Inteliquent Inc. (Sinch America Inc.)

support@inteliquent.com

3500 Lenox Rd NE, Ste. 1875

Atlanta, GA 30326, Georgia, USA

Peerless Network, Inc (Infobip LLC.)

regulatory@peerlessnetwork.com

433 W. Van Buren Street, Suite 410S

Chicago, IL 60607.

- **ONGOING ROBOCALL MITIGATION PROGRAM**

WhiteSky Communications has made meaningful investments in staff and functionality to provide effective measures for combatting Robocall activity in accordance with FCC rules. If necessary, WhiteSky Communications and its third-party vendors will block any identified robocalls as directed by the Commission.

- **STIR/SHAKEN ATTESTATION**

WhiteSky Communications certifies that it is following the FCC's provisions and is committed to mitigating robocall traffic for our customers.

WhiteSky Communications reserves the right to refuse traffic from any party at any time where robocalling or use of originating numbers that are not valid or are not authorized to use has occurred or is suspected. WhiteSky Communications is able to block the originating number(s), terminating numbers(s), trunk(s) or customer, including termination of customer relationship to prevent robocalling, invalid originating number or spoofed origination number transiting WhiteSky Communications' networks.