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QualStar Communications, Inc. (QualStar or the “Company”) was founded in 2000 to originally serve Northwest Ohio with competitive local phone service. QualStar currently provides service to both wholesale and retail customers. Our goal today is to provide customers with leading edge and affordable communications solutions complementing the coverage area that our affiliate companies operate in.

Certification

I, Phillip D. Maag, President of QualStar Communications, Inc. hereby certifies that the Company has partially implemented STIR/SHAKEN authentication in portions of its network. As noted herein, the IP-portion of the network is fully compliance while the non-IP network remains subject to a deployment extension set forth in 47 CFR § 64.6304(d) as further explained in this document.

The Company has not been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation within the last two years due to suspected unlawful robocalling or spoofing.

The Company has not been prohibited from filing in the Robocall Mitigation Database.

IMPLEMENTATION of STIR/SHAKEN in the IP PORTION of its NETWORK.

Effective June 30, 2023, QualStar implemented STIR/SHAKEN in the IP portion of its network as required by FCC rules.

QualStar has been granted an authentication and certification for its STIR/SHAKEN process and implementation. QualStar is using Iconectiv and TransNexus as our vendors of choice and is listed as an authorized provider.

The IP portion of its network transports originating interstate and intrastate traffic. All other originating and terminating calls that route via the Brightspeed LATA tandem are transported over TDM trunks that are required by Brightspeed and are not compatible with current SHAKEN technology. QualStar is prepared to rapidly implement STIR/SHAKEN for these calls as soon as Brightspeed converts from TDM to SIP trunks at its tandem switch. QualStar is not aware of any plans that Brightspeed has for such a conversion and has no control over when or if it will take place. This TDM-based service remains subject to the FCC’s continuing extension set forth in 47 CFR § 64.6304(d).

PROCEDURES TO MITIGATE OR STOP ROBOCALLS

I. KNOW YOUR CUSTOMER

QualStar, follow(s) the best practices for the implementation of call authentication frameworks recommended by the North American Numbering Council (NANC) - Call Authentication Trust Anchor Working Group [NANC CallerID Best Practices](#).

This includes confirming the identity of QualStar customers – (i) contact person(s); (ii) business location; (iii) state or country of incorporation; (iv) federal tax identification; and (v) the nature of our customers’ businesses.

Customers using our services agree to abide by the rules and regulations listed in our service agreement. QualStar’s service agreement expressly prohibits customers/subscribers from engaging in illegal, unlawful, abusive, or fraudulent purpose.

Customers are informed that any suspicious activity will be investigated; and if the customer is engaging in, or has engaged in illegal robocalling, their service will be terminated.

II. TRACEBACK

QUALSTAR will respond to all traceback requests from the Commission, law enforcement, and the Registered Traceback Consortium within twenty-four hours of receipt of the request. In the event illegal robocallers use our system, QualStar will cooperate with such entities’ investigation.

For any traceback and investigation request received through our Robocall Mitigation Contact, we will respond with a higher priority than Local Number Porting requests. When provided with sufficient information to identify calling activity within our records, we are able to trace the source of the calls to the source customer. In the rare and unlikely scenario where a third party has fraudulently gained access to customer systems or to services through our switch environment, our records include originating address information that will further the investigation into any potential robocalling entities using fraudulent access for this purpose. As part of our response process, we will thoroughly review all records and determine the source of the offending calling party.

In the event that the offending party is a paying customer, said customer will be subjected to the terms and conditions of our service and could be subjected to termination of service. If the offending party is a fraudulent third party, then that access will be immediately terminated, and a thorough review initiated to determine how the third-party access was gained with appropriate steps taken to prohibit any future access by the fraudulent third party.

The Company’s primary point of contact for traceback is:

Name:	Michael Brinkman
Title:	COE & Operations Supervisor
Phone:	419-395-2222
Email:	robocall@team-meta.net

III. KNOW YOUR UPSTREAM PROVIDER

QualStar operates with multiple upstream providers to facilitate traffic to and from its customers. Each of the carriers from which it sends or receives traffic is listed in the Robocall Mitigation Database. Basic identification information, such as physical business location, contact person(s), state of incorporation, and nature of business, are collected for all of the Company's up-stream providers. Going forward, all contracts for calling services and interconnection agreements will include prohibited traffic and traceback language.

IV. ROBOCALL MITIGATION PLAN

QualStar has taken the following actions to comply with the Robocall Mitigation Caller ID requirement:

First, as a smaller service provider, understanding the service needs of each individual customer is part of our customer relationship and sales process. This understanding provides us with an ability to mitigate the potential of a customer initiating illegal robocalls before they have an opportunity to connect to our services.

Second, as a smaller company primarily serving rural communities, our services are targeted to residential and small business usage. These customers are configured for service either off systems that cannot generate more than a single call at a time or are otherwise limited in the number of concurrent calls that would render an illicit robocalling platform from operating in a cost-effective manner. All customers are subjected to active monitoring of originated calling traffic that prohibits initiating non-emergency calls beyond the concurrent calls that a customer has contracted for.

Finally, in the event that a larger customer has enough calling capacity where their active business operations and connectivity may allow for a potential of either a purposeful or fraudulent third-party initiated illegal robocall operation, active monitoring is in place through a tiered system that will alert the company to the presence of this activity. The first tier is monitoring and reporting within the service providing systems that trigger when a customer reaches their call limits. The second tier is a standalone monitoring system within the company's network that monitors and alerts when calling conditions may indicate a breach or otherwise potential illicit increase in calling activity through company service systems. The final tier is fraudulent activity monitoring provided by our interconnected third party utilized for originated calls to the public switched telephone network (PSTN). This third party provides monitoring services that alert and mitigate PSTN access for originating callers when fraudulent activity is detected.

These items mitigate the potential of any customer or illicit third party from initiating illegal robocall activity utilizing the company's services.

V. PLAN UPDATES

QualStar will continue to monitor industry best practices and improve our internal processes to ensure our systems adapt to address the ongoing challenges affecting this industry.