

Champlain Broadband LLC d/b/a Burlington Telecom

ROBOCALL MITIGATION PLAN

Champlain Broadband LLC d/b/a Burlington Telecom (“Burlington Telecom”) provides telephone services with the support of its carrier partner, Bandwidth Inc. (“Bandwidth”), which is also registered in the FCC’s Robocall Mitigation Database.

In addition to implementing STIR/SHAKEN on its network, Burlington Telecom has adopted this robocall mitigation plan to take its own measures to limit the potential for the origination of unlawful robocalls from or on its network.

Know-Your-Customer Policies

Subscriber Vetting: Burlington Telecom vets the identity of its customers when approving an application and entering into an agreement to provide telephone service. As part of this vetting process, Burlington Telecom visits each location where service will be provided and collects the customer’s legal name and address and other contact information. Burlington Telecom’s services are provided to fixed locations and services are installed on location by its personnel, so Burlington Telecom knows the actual location of its customers. This information enables Burlington Telecom to validate the identity of potential customers prior to provisioning of service. Service will not be provided if a new customer’s identification cannot be verified.

Contractual Terms: Burlington Telecom’s terms of service prohibit the use of its telephone service for fraudulent or unlawful acts or purposes, and permits the company to terminate a customer’s service for violations of its terms.

Use of Call Analytics to Identify and Block Unlawful Traffic

Burlington Telecom relies on Bandwidth’s call analytics systems to identify and block unlawful robocall traffic as set forth in its robocall mitigation plan on file with the FCC.

Bandwidth reports that: (1) its call analytics detect call patterns that indicate robocall activity through its “Call Blocking Tool” that incorporates industry best practices and FCC recommendations into its core network to identify and block invalid and illegal telephone numbers; (2) its fraud and security experts respond to complaints and trouble tickets with customers that may be associated with the unlawful uses of its services; (3) it incorporates its learnings into its traffic data analytics and detection technologies to continually improve its capabilities to accurately detect suspected illegal activity and deploy mitigation measures; and (4) if an unlawful robocall campaign is detected, it notifies upstream customers of the problematic traffic and requests immediate corrective actions, including termination of an arrangement that places downstream providers and consumers at risk.

If Burlington Telecom receives a report or alert from Bandwidth of suspected unlawful robocall traffic originated by a Burlington Telecom end user customer, it will conduct an investigation. To the extent a customer is found to have violated terms, Burlington Telecom will take action

commensurate with the severity of the customer's offense, including, but not limited to, providing the customer with a warning or terminating the customer's service without notice.

Knowledge of Upstream Provider

Burlington Telecom's sole upstream provider, Bandwidth, is a well-known, reputable voice service provider that is registered in the FCC's Robocall Mitigation Database. Burlington Telecom does not itself have knowledge or insight into the upstream providers from which Bandwidth receives traffic, but understands from its mitigation plan that its direct upstream connections are with service providers that similarly have represented to the FCC that they have policies and procedures to identify and block unlawful robocall traffic.

Cooperation with the Traceback Group, Law Enforcement and Government Agencies

Burlington Telecom is committed to responding fully and within 24 hours to all traceback requests made by the Industry Traceback Group ("ITG"), law enforcement authorities, and government agencies to investigate and address suspected unlawful robocalls originated by Burlington Telecom customers.

Burlington Telecom is also committed to fully complying with the Commission's robocall blocking requirements itself and in cooperation with its carrier partner, Bandwidth. Burlington Telecom confirms that it will block calls and traffic within its control 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 Commissions; or (3) include a caller ID number or name that is on the DNO list issued by the ITG.