

Consolidated Smart Broadband Systems, LLC

dba Smartaira

Robocall Mitigation Plan

Introduction

This document details the reasonable steps and actions taken by Consolidated Smart Broadband Systems, LLC dba Smartaira (“Smartaira”) to mitigate and eliminate illegal robocalling. Smartaira has an ongoing commitment to scan for and help alleviate illegal robocalling by pre-qualifying prospective customers, monitoring existing customers for traffic patterns indicative of prohibited robocalls, and working with other providers and regulatory agencies in combatting fraudulent voice activity.

Smartaira is a high-speed Internet provider that also offers interconnected VoIP communications services to both business and residential subscribers. Smartaira has fully implemented the STIR/SHAKEN authentication framework across our entire network, and all calls we originate are compliant with § 64.6301(a)(1) and (2). Smartaira has our own token and OCN (223K).

Know Your Upstream Providers

Through Smartaira’s Terms and Conditions, we mandate that each agreement with our upstream providers incorporates strict policies pertaining to fraudulent calls. Our upstream providers agree to abide by the FCC’s STIR/SHAKEN and robocall mitigation rules in all respects when providing voice services. Smartaira and its provider partners have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests. Two of our upstream providers are VoIP Innovations & Commio.

Know Your Customer

Screening interviews are performed to understand potential customer needs and/or business models and the potential, or lack thereof, for involvement in fraudulent robocalling schemes. We also require potential subscribers to provide us with their address, DOB, and credit card for automated billing.

Smartaira has implemented Know Your Customer Policy and Procedures used when onboarding new or renewing customers to ensure that such customers do not or are not likely to engage in any prohibited conduct.

Traceback Requests

Smartaira is committed and will respond fully within 24 hours to all Traceback Requests from the FCC, law enforcement agencies, and the industry traceback consortium and vows to cooperate with these agencies in investigating and stopping any illegal robocallers that use our service to make calls. Smartaira will devote sufficient resources to provide prompt and complete information to traceback requests. Our points of contact to handle all traceback requests are:

Donavan DeBusk	Alex Ortiz	Brian Wolverton
Network Engineer	Lead Network Engineer	CTO
310-200-6243	310-505-2529	480-399-5595
ddebusk@smartaira.com	aortiz@smartaira.com	brian@smartaira.com

Upon calling our dedicated Traceback contact, we will put the requestor in direct contact with the soft switch support provider to facilitate all requests.

If a traceback exposes an existing customer as the source of fraudulent robocalls, or as having transmitted fraudulent robocalls, a demand for an explanation and verification of mitigation of the traffic is issued to the customer. If the fraudulent traffic is not remediated, Smartaira immediately begins taking disciplinary action against the offending customer.

Telephone Numbers

A Telephone Number ("TN") based caller identity is the originating phone number included in call signaling used to identify the caller for screening purposes that is uniquely associated with the subscriber. A subscriber is permitted to use a TN as a caller identity if they complete a LOA form to allow us to submit a port request to the previous provider to allow the previous provider to allow the number to port over to our platform.

For subscribers with multi-line telephone systems, Smartaira and our upstream provider only allow calls to be connected if the originating number matches one of the TN's assigned to the subscriber. This screening capability enables an automated and secure method of validating originating telephone numbers.

International Calling

Smartaira is not currently an international voice services provider. If at any time Smartaira does decide to sell our services to international customers using North American Numbering Plan resources, we will familiarize ourselves with and develop best practices for full vetting of such

customers and work with our upstream provider to perform the necessary telephone number validation on all international originated calls.

Call Analytics

We apply an internally developed call analytic system to calls originating and/or terminating on our network. With respect to calls originating on our network, certain proprietary thresholds are monitored per-customer for number of calls initiated in 60 second, 5 minute, and 15 minute intervals. Exceeded thresholds result in reports to support staff who can investigate underlying call patterns and take appropriate actions including suspending services to the customer if any inappropriate calling is not halted immediately.

Ongoing Robocall Mitigation

Smartaira uses the platform Martini Security as our STIR/SHAKEN Certificate provider and this platform will validate any legitimate traffic. The softswitch platform's back end monitors STIR/SHAKEN certificate validity. Smartaira also monitors and examines call detail records (CDRs) on a repeating basis to detect suspicious call activity and/or calling patterns. When we detect network usage patterns consistent with illegal robocalls or suspect illegal robocalling is taking place, we will immediately seek to identify the party that is originating, terminating, or routing these calls so that we may take appropriate action. The actions taken may include, but are not limited to initiating a traceback investigation; verifying that the originating customer owns or is authorized to use the Caller ID number; determining whether the Caller ID name sent to a receiving party matches the customer's corporate and/or d/b/a name; block the party's ability to originate, terminate, or route calls on the network; and/or providing notice to law enforcement authorities. If we determine that traffic is illegal, we take the following action:

- First offense the customer receives a verbal warning.
- Second offense the customer has service shut off until they call to have service reinstated and receive a second warning that if this happens again services will be terminated with no warning.
- Third offense services are shut off permanently.

Smartaira Contact for Robocall Mitigation-Related Issues

Smartaira will update our Robocall Mitigation filings within 10 business days of any change to the information outlined in this plan. Please direct any questions related to Robocall Mitigation issues to:

Donavan DeBusk, Network Engineer

620 W 135th St

Gardena, CA 90248

310-200-6243

voip@smartaira.com