

Westel, Inc.

Robocall Mitigation Plan

Westel is a small service provider with fewer than 100,000 voice subscriber lines and qualified for an extension of the STIR/SHAKEN requirement under 47 C.F.R. Section 64.6304(a)(2) . We currently do not control the network infrastructure used by our customers but rather utilize wholesale white-label VOIP services from Tier 1 carriers. Our network no longer has direct access to the PSTN but rather all originating and terminating calls are processed through wholesale service providers who handle interfacing with the PSTN. While no longer directly connected to the PSTN, Westel continues to combat illegal calls using the following strategies in accordance with FCC regulations.

Robocall Mitigation Program

Know Your Customer

New Customers – Westel is engaged in a business-to-business sales model and screens all new customer opportunities. All of our customers have corporate offices in the United States. Westel validates customer information such as physical address, Federal Tax ID number and incorporation status.

Existing Customers – All customers have access to tools for call screening and can block calls by using CallerID details. Westel periodically reviews Call Detail Records for suspicious behavior and patterns that are indicative of robocalls that are in violation of our Terms and Conditions and Acceptable Use Policies.

Know Your Upstream Provider

Westel uses third party Tier 1 carriers to process calls for its customers. Our primary provider is Bandwidth Inc (FRN 0015443773). Westel monitors the status of the third party carriers within the Robocall Mitigation Database and will not accept service from those carriers that are removed from the database. In addition, the filed Programs of these carriers have been reviewed by the Company to understand the specific steps a provider is taking to mitigate illegal robocalls. These steps and others outlined within this Program help mitigate the possibility of our third party providers to carry or process a high volume of illegal traffic.

Calling Party Number Policy

- By default, customers are only allowed to transmit Calling Party Number of numbers they own. Westel has an established process to insure subscribers are utilizing only telephone numbers assigned to them.
- Customers requesting to transmit CPN other than owned numbers are required to provide a valid business case. For example:
 - o 3rd Party Contact Center presenting enterprise client's phone number.
 - o Outbound-only lines presenting valid call back number.
 - o Remote Workers presented company phone number in place of personal phone number.
- All policy exceptions are documented and tracked.

Call Authentication

- Calls authenticated by third party SIP providers.
- Existing numbers only terminate or originate calls with Tier 1 Carriers that all have their own internal robocall mitigation processes and protocols.

Traceback Compliance

Westel certifies that it commits to respond within twenty four (24) hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robo callers that use its service.

Regulatory

Westel, Inc. has not been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with findings of actual or suspected wrongdoing of transmitting or facilitating illegal robocalls or a deficient Robocall mitigation Database certification or mitigation program description.

Westel, Inc. has not been prohibited from filing in the Robocall Mitigation Database pursuant to a law enforcement action.

Westel, Inc. OCN is 7399. Westel, Inc. is not a foreign voice provider.

Westel, Inc. has identified their role in the call chain as part of the certification submitted within the Robocall Mitigation Database.