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ROBOCALL MITIGATION PLAN

California Internet, LLC DBA GeoLinks (“GeoLinks”) is a leading telecommunications company and competitive local exchange carrier (CLEC) public utility, headquartered in Southern California.

PROCEDURES TO MITIGATE OR STOP ROBOCALLS

I. KNOW YOUR CUSTOMER

GeoLinks follows the North American Numbering Council (NANC) - Call Authentication Trust Anchor Working Group guidelines and best practices for vetting caller identity NANC CallerID Best Practices.

This includes confirming the identity of GeoLinks 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.

GeoLinks’ services are targeted to residential and small business usage. These customers are limited in the number of concurrent calls that would render an illicit robocalling platform from operating in a cost-effective manner.

II. CONTRACTUAL TERMS

Customers using GeoLinks’ services agree to abide by the rules and regulations set forth in our “Acceptable Use Policy.” GeoLinks’ Acceptable Use Policy expressly prohibits customers/subscribers from engaging in illegal activity, including creating a false Caller ID (i.e. spoofing).

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 may be terminated without prior notice.

II. TRACEBACK

GeoLinks commits to respond fully, within 24 hours, to all traceback requests from the Commission, law enforcement, and the Registered Traceback Consortium. In the event illegal robocallers use our system, GeoLinks will cooperate with such entities’ investigation.

III. ROBOCALL MITIGATION PLAN

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

GeoLinks has the capability to mitigate robocalls the mitigation methods listed below.

- Blacklists
 - Block calls by calling numbers or call prefixes
 - Block calls based on calling locations that include states, provinces, regions and counties outside GeoLinks' service areas
 - Block IP addresses identified as SPAM or robocalls
 - Identify User agents that our customers do not use
- Call CAPTCHA
 - Route calls to an automated IVR to perform a CAPTCHA test to confirm the caller is human
 - Call Detail Record (CDR) Analysis
 - Generate reports that identify high call volume, short call durations, and excessive calls to and from the same number
- Customer Controls
 - Call volume limits
 - Ability to block calls

IV. Know-Your-Upstream-Provider

GeoLinks has agreements in place with all service providers that facilitate its provision of voice services. GeoLinks has confirmed that each of these service providers are listed in the Robocall Mitigation Database. GeoLinks has taken steps to ensure that it will not accept traffic from any carrier that is removed from the Robocall Mitigation Database.

V. PLAN UPDATES

GeoLinks 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.