



LakeNet LLC
16690 Gratiot Rd
Hemlock MI 48626

LakeNet Robocall Mitigation Plan

LakeNet is a small facilities-based Fiber ISP and voice service provider (VSP) dedicated to stopping illegal calls from originating in our network and monitoring the calls coming into our network.

The FCC requires that, by June 30, 2021, all VSPs certify in the Robocall Mitigation Database that they have (1) fully implemented STIR/SHAKEN across its entire network, (2) implemented STIR/SHAKEN on a portion of its network and that the remainder of the calls are subject to a Robocall Mitigation Plan (RMP), or (3) have not implemented STIR/SHAKEN but subject all calls to an RMP to ensure that the network is not originating illegal robocalls.

The FCC requires that VSPs develop an RMP that:

- Lists the specific, reasonable steps the VSP has taken to avoid originating illegal robocall traffic
- States a commitment to respond fully and in a timely manner to all traceback requests from the FCC, law enforcement, and the industry traceback consortium
- To cooperate with entities investigating and stopping any illegal robocallers that use its services to originate calls

LakeNet purchases origination, termination, and hosted-switch access from VOIP Innovations (FRN 0016266157 ("Provider")) who provides crucial elements of our RMP as part of their interconnected VoIP wholesale services to LakeNet.

Policies

LakeNet's Terms of Service and Acceptable Use Policy specifically disallow any illegal use of our services, including robocalling, and any use of our services for spamming or unsolicited messages, or for impersonating or concealing a user/caller's identity. All LakeNet customers sign a service contract agreeing to abide by the terms of service and acceptable use policy before service may be activated.

STIR/SHAKEN Status

Our upstream voice provider VOIP Innovations is fully STIR/SHAKEN compliant and signs and provides attestation on our calls as an intermediate provider. Our voice switch platform is not compatible with STIR/SHAKEN and we cannot implement it on our switch, however we will use VOIP Innovations' hosted STIR/SHAKEN server service to sign our calls with our certificate.

Customer Identity

We follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>).

As a local facilities-based fiber provider, we provide voice services exclusively for customers at service locations where we have installed facilities/equipment to provide the voice service. Additionally, as a rural provider, our customer base is residential and small business end users. This provides a high level of confidence in the customer identity and in the low risk status in regard to illegal calling activities. We do not sell off-network voice services or standalone SIP trunks which would be a higher

risk service in regards to robocalling.

International Subscribers

LakeNet does not sell voice services to subscribers outside of the united states.

Caller-ID / DID Ownership

In our network, we only allow outbound calls from DIDs that are associated with the specific service location / account placing the call. We do not allow calls with caller-ID information different than the DID(s) associated with the account.

Investigation of High-Volume Network Traffic, Suspicious Calls, and Calling Patterns

Our Provider VOIP Innovations uses an internally developed solution to monitor our origination voice traffic in real time to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts Provider if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. The Provider will immediately ask LakeNet to investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If LakeNet or Provider determines that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as based on our AUP.

Traceback

We respond within 24 hours to all traceback requests from the FCC, law enforcement, our Provider and the registered traceback consortium. We cooperate fully with such entities in investigating and stopping any illegal robocallers using our services. Traceback requests should be sent to lakenet@lakenetmi.com.

Any questions about these policies and any lawful requests for call information or call tracing should be directed to:

Christopher Fabien
Member, LakeNet LLC
16690 Gratiot Rd
Hemlock MI 48626
lakenet@lakenetmi.com