

Robocall Mitigation Plan

Business Information

Manhattan Telecommunications Corporation LLC

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FRN: 0004365144

Contact Information

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Background

This updated mitigation plan is submitted on behalf of Manhattan Telecommunications Corporation LLC, a privately held company and its wholly owned subsidiaries listed in Exhibit A, each being competitive local exchange providers and collectively referred to herein as “MetTel.” Each of the MetTel companies operate in the United States and share operations including this Robocall Mitigation Plan.

MetTel is a VoIP service provider and provides SIP services using its own network with a STIR/SHAKEN implementation serving end users. MetTel has not requested any STIR/SHAKEN extensions or exemptions. MetTel also provides resold TDM and CMRS voice services through wholesale or resale relationships with underlying providers. MetTel does not provide TDM or CMRS voice service in its network. MetTel has verified its wholesalers have submitted RMD plans that address their own mitigation measures.

MetTel is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing. As part of STIR/SHAKEN implementation we assign attestation to all outbound calls and monitor calling activity. For all inbound calls we review attestation levels and also validate inbound phone numbers. MetTel provides customers the option to block robocall traffic identified by the RedShift Networks platform. We can also block robocall traffic if requested by a regulatory agency. MetTel's OCN is 2372.

MetTel utilizes internally-developed real time call analytics to help identify potentially fraudulent call activity, such as calls of an extremely short duration or excessive call volumes to a specific destination over a defined period of time. In addition, MetTel prevents outbound calls to regions that are known for fraudulent activity and blocks inbound calls from IP addresses that attempt to disrupt our operations. As part of our Robocall Mitigation Plan we notify key internal operations teams and of suspected robocall activity so that MetTel can take swift action as appropriate.

Subscriber Vetting

MetTel conducts data gathering and review throughout the negotiation and onboarding process of each new customer when (i) approving an application for service; (ii) provisioning of network connectivity; (iii) entering into a contract agreement; or (iv) granting the right-to-use telephone number resources. In this process, MetTel collects customer legal name and address, physical location, contact name(s) and telephone numbers and federal tax ID. MetTel will also explore the nature of the customer's business, including authorization to provide service and the intended target market for customers engaged in further resale. Service will not be provided if a new customer's identification cannot be verified.

Telephone Number Validation

Telephone calls can only be originated on the MetTel VoIP network by authenticated MetTel subscribers using telephone numbers assigned by or ported to MetTel.

Know Your Upstream Provider (KYUP)

MetTel fully supports the Commission's KYUP requirements and takes affirmative and effective measures to prevent upstream providers from transmitting illegal calls. MetTel maintains direct commercial relationships with its three (3) upstream voice service providers: Bandwidth, Sinch and Verizon. These three providers are industry recognized telecommunications organizations that maintain their own regulatory compliance and robocall mitigation controls and MetTel has conducted its own due diligence and has determined that they are trusted upstream providers with robust compliance programs, including STIR/SHAKEN. MetTel also periodically reviews its upstream provider relationships and will take appropriate action if it becomes aware of any provider engaging in practices that present an unreasonable risk of unlawful robocalling, spoofing, or other fraudulent telecommunications activity.

Mitigation Through Contracts

Provisions in MetTel's customer contracts require customers to cooperate with traceback requests, and prohibit any unlawful, abusive or illegal use of services, including an express prohibition on the use of the service for illegal robocalling. Contractual provisions also provide MetTel the right to suspend or interrupt service that is being used to violate these policies. MetTel will seek to identify the party that is using its network to originate such calls and take appropriate action under the customer's contract.

Contractual provisions in underlying carrier contracts obligate the underlying carrier to comply with applicable law, which include laws applicable to robocalling and mitigation efforts. MetTel will update these agreements to expressly reference illegal robocalling as part of periodic renewal efforts.

Customer Education and Relationship

Although the TRACED Act's and the FCC's requirements for robocall mitigation plans are focused on reducing robocalls that originate on MetTel's network, MetTel also makes available documentation to customers about available options and features to help combat unwanted calls, including Caller ID and call Blocking, and "star" services like last number callback.

Tracebacks / Investigation of Suspected Robocalling

MetTel 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 MetTel's customers, using appropriately trained individuals prepared to promptly investigate and respond to these requests. This applies to both VoIP and wireless calls.

When an underlying provider indicates the presence of suspected illegal robocalling, MetTel cooperates with the provider to investigate and verify suspicious activity with customers. If appropriate, MetTel will enforce contractual restrictions including suspending customers who are putting robocalls into the system and contact relevant law enforcement agencies.

Exhibit A

List of Subsidiaries

Entity	FRN
Manhattan Telecommunications Corporation LLC	0004365144
Metropolitan Telecommunications of Alabama, LLC	0014894810
Metropolitan Telecommunications of Alaska, LLC	0031094824
Metropolitan Telecommunications of Arizona, LLC	0014520365
Metropolitan Telecommunications of Arkansas, LLC	0014520332
Metropolitan Telecommunications of California LLC	0014156467
Metropolitan Telecommunications of Colorado, LLC	0015262298
Metropolitan Telecommunications Corporation of CT LLC	0031094857
Metropolitan Telecommunications Corporation of DE LLC	0014156483
Metropolitan Telecommunications of D.C., LLC	0031094865
Metropolitan Telecommunications of Florida LLC	0008429276
Metropolitan Telecommunications of Georgia LLC	0009155078
Metropolitan Telecommunications of Hawaii, LLC	0018652099
Metropolitan Telecommunications of Idaho, LLC	0015262306
Metropolitan Telecommunications of Illinois, LLC	0014156517
Metropolitan Telecommunications of Indiana, LLC	0014520373
Metropolitan Telecommunications of Iowa, LLC	0015202492
Metropolitan Telecommunications of Kansas, LLC	0015202500
Metropolitan Telecommunications of Kentucky, LLC	0014894836
Metropolitan Telecommunications of Louisiana, LLC	0014894851
Metropolitan Telecommunications of Maine LLC	0014180756
Metropolitan Telecommunications of Maryland LLC	0031094881
Metropolitan Telecommunications of Mass. LLC	0008429409
Metropolitan Telecommunications of Michigan, LLC	0014156541
Metropolitan Telecommunications of Minnesota, LLC	0015202518
Metropolitan Telecommunications of Mississippi, LLC	0015202534
Metropolitan Telecommunications of Missouri, LLC	0015202559
Metropolitan Telecommunications of Montana, LLC	0015452626
Metropolitan Telecommunications of Nebraska, LLC	0015499866
Metropolitan Telecommunications of Nevada, LLC	0015499882
Manhattan Telecommunications Corporation of New Jersey LLC	0006685499
Metropolitan Telecommunications of New Hampshire LLC	0014180780
Metropolitan Telecommunications of New Mexico, LLC	0015202583
Metropolitan Telecommunications of North Carolina, LLC	0014156558
Metropolitan Telecommunications of North Dakota, LLC	0016774069
Metropolitan Telecommunications of Ohio LLC	0014156574
Metropolitan Telecommunications of Oklahoma, LLC	0015202591
Metropolitan Telecommunications of Oregon LLC	0015220221
Metropolitan Telecommunications of Rhode Island LLC	0014180798
Metropolitan Telecommunications of PA, LLC	0004365615
Metropolitan Telecommunications Corp of Penns LLC	0009179979
Metropolitan Telecommunications of South Carolina, LLC	0031094899
Metropolitan Telecommunications of South Dakota, LLC	0016774077
Metropolitan Telecommunications of Tennessee, LLC	0015262314
Metropolitan Telecommunications of Texas LLC	0009154956
Metropolitan Telecommunications of Utah, LLC	0015452642
MetTel of VA, LLC	0031094915
Metropolitan Telecommunications of Vermont LLC	0031094923

Metropolitan Telecommunications of Washington, LLC	0014894877
Metropolitan Telecommunications of West Virginia LLC	0014156582
Metropolitan Telecommunications of Wisconsin, LLC	0014520381
Metropolitan Telecommunications of Wyoming, LLC	0014156590
Business Productivity Solutions, LLC	0013645569
Metropolitan Telecommunications of Puerto Rico, LLC	0031094949