

ATWOOD CABLE SYSTEMS, INC

ROBOCALL MITIGATION PLAN

Atwood Cable Systems, Inc is a Cable TV, Internet service provider that offers interconnected VoIP services to its subscribers on a “resold” basis. Atwood Cable Systems, Inc’s wholesale provider is Momentum Telecom, Inc. (“Momentum”), a provider of wholesale and retail VoIP and other telecommunication services throughout the United States.

Atwood Cable Systems, Inc relies on the robocall mitigation policies, procedures and safeguards instituted by Momentum. Atwood Cable Systems, Inc has also adopted this robocall mitigation plan to take its own actions to limit potential for the origination of robocalls, that are unlawful, by its customers carried and or processed by Momentum and other downstream providers. Rule 47 CFR § 64.6301. This exemption applies because Atwood Cable Systems, Inc., operates as a non-facilities-based reseller of voice services, relying entirely on upstream carriers' IP infrastructure for call origination and transit. We do not own, control, or manage any IP network elements (e.g., switches, session border controllers, or SIP signaling paths) required to implement STIR/SHAKEN authentication. All calls are handed off to Momentum Telecom, who handle authentication on their facilities-based networks. As a result, we lack the technical capability to deploy STIR/SHAKEN independently, consistent with FCC guidance for resellers and wholesalers without direct network control. Our robocall mitigation relies on contractual requirements with upstream providers to authenticate calls and block illegal traffic before it reaches our service layer.

Know Your Customer Policies

Subscriber Vetting: Atwood Cable Systems, Inc vets the customer’s identity when approving the customer’s application for VoIP telephone service. Part of this process, Atwood Cable Systems, Inc collects the customer’s legal name, mailing and physical address and all contact information, and for commercial customers EIN and other information to validate customer. Atwood Cable Systems, Inc services are provided to a fixed location using its own network that is installed by our own installers therefore we know the actual location of services being installed for that customer. Atwood Cable Systems, Inc does not provide service if the new customer’s information cannot be verified.

Contractual Terms: Atwood Cable Systems, Inc subscriber agreements prohibits the use of our VoIP phone service for telemarketing, call center or fax broadcasting along with any other unlawful purposes. If Atwood Cable Systems, Inc determines the customer has violated any of the terms of the subscriber agreement, we may terminate sum or all of services.

Use of Call Analytics to Identify and Block Unlawful Traffic

Atwood Cable Systems, Inc relies on Momentums use of call analytics systems to identify and block unlawful robocall traffic as set forth in Momentum's robocall mitigation plan on file with the FCC. Momentum reports that the call analytics it employs for Atwood Cable Systems, Inc traffic can detect call patterns that indicate robocall activity, including, but not necessarily limited to, an unusual large number of calls from the same number, an excessive number of short duration calls and calls that stop attempting to connect after a single ring, and calling numbers that are invalid, unallocated or on the Industry Traceback Groups Do Not Originate ("DNO") list.

If Atwood Cable Systems, Inc receives a report or alert from Momentum of suspected unlawful robocall traffic originated by an Atwood Cable Systems, Inc customer, Atwood Cable Systems, Inc will initiate an investigation. If a customer is found to have violated Atwood Cable Systems, Inc subscriber agreement, Atwood Cable Systems, Inc will take action, depending on severity of customer's offense, including, but not limited to, giving the customer a warning or the termination of their service without notice.

Knowledge of Upstream Providers

Atwood Cable Systems, Inc upstream provider, Momentum, is a well-known, reputable wholesale service provider that is registered in the FCC's Robocall Mitigation Database. Atwood Cable Systems does not itself have knowledge or insight into the upstream providers from which Momentum receives traffic, but understands from Momentum's mitigation plan that Momentum's direct upstream connections are with service providers that similarly have represented to the FCC that they have policies and procedures to identify and block unlawful robocall traffic.

Cooperation with Traceback Group, Law Enforcement & Government Agencies

Atwood Cable Systems, Inc 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 Atwood Cable Systems, Inc customers.

Atwood Cable Systems, Inc is also committed to cooperating with Momentum on traceback requests and to fully complying with the Commission's robocall blocking requirements. Atwood Cable Systems, Inc understands that Momentum will block all calls and provider traffic that: (1) are identified in any public notice or order released by the FCC; (2) are substantially similar to the types of traffic identified in any public notice or order released by the Commission; or (3) include a caller ID number or name that is on DNO list issued by ITG.