

Lumos Telephone, LLC Robocall Mitigation Plan

Lumos Telephone, LLC (**OCN 0226**), d/b/a Lumos (“Lumos”) has implemented the following Robocall Mitigation Plan to detect and prevent unlawful robocalls from originating on its network. Lumos is a voice provider in the call chain, with a STIR/SHAKEN implementation obligation that serves end users on the IP Portion of its network. It has no STIR/SHAKEN obligation on the non-IP Portion of its network. All calls that originate on its network are subject to this robocall mitigation plan.

Lumos certifies that it has not been prohibited from filing in the FCC Robocall Mediation database, nor has it been involved in any law enforcement or regulatory investigation into any suspected unlawful robocalling.

STIR/SHAKEN STATUS

Lumos has implemented STIR/SHAKEN in the IP portion of its network. The originating IP calls are signed using the Lumos certificate and this traffic is fully attested. We have implemented a STIR/SHAKEN solution supported by TransNexus.

Robocall Mediation

Pursuant to 47 CFR § 64.6303(a)(2) and 64.6304(d), Lumos is subject to a continuing extension on the non-IP portion of its network. Lumos still serves customers on the non-IP portions of its network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls. Lumos participates through a third-party representative as a member of the working group that is working to develop a non-internet protocol caller identification authentication solution.

Lumos has contracted with a vendor, TransNexus, to provide call analytics and reputation scoring of its network’s outbound traffic. The vendor’s analytics identify patterns of suspected illegal robocalls and scores the calls based on their behavior and/or their status as suspected robocalls as reported to the Federal Communications Commission, Federal Trade Commission, and as reported by other carriers. Lumos has access to the vendor’s portal and receives real-time notifications about telephone numbers originating suspected illegal robocalls on its network, including from unassigned, inactive and do-not-originate TNs. Lumos also receives reports via e-mail alerts if any of its numbers experience a change in reputation such as suspicious traffic patterns or other detected anomalies outside the normal behaviour of our company’s traffic. Lumos will examine

the reports and investigate and identify the source of the calls as unlawful or legitimate. If we identify that a caller is attempting to originate unlawful robocalls we will warn the caller to cease and desist or their service will be terminated as appropriate.

Upstream Providers

Lumos vets upstream providers, that is, providers that send us voice traffic that we terminate or transit to other providers by confirming the upstream provider has a certification in the Robocall Mitigation Database. We will not accept traffic from an unregistered provider. We have reviewed the connected carrier's RMP to learn how the carriers monitor their originating traffic to mitigation illegal robocalls. Lumos is now incorporating traceback and prohibited traffic language in all new contractual agreements with carriers.

Traceback

Lumos will respond within 24 hours to all traceback requests from the FCC, civil and criminal law enforcement, and the industry traceback consortium. Lumos is committed to cooperating with such entities in investigating and stopping any illegal robocallers that we learn are using our service to originate calls.

Customer Vetting

Lumos has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Lumos thoroughly vets new residential and business customers by verifying the identity of the customer on each account before activating new service or making changes to existing services.

Enforcement

If it is determined a Lumos customer is originating prohibited unlawful robocalls on our network, Lumos will either warn the customer to stop or terminate their service as allowed per Lumos's policies that define the circumstances by which Lumos will suspend or terminate service to a customer. The policies can be viewed here:

<https://www.lumosfiber.com/terms-and-conditions/>.