

Robocall Mitigation Plan Description for Empower Telecom Inc.

Empower Telecom commits to respond to all traceback requests, within twenty-four (24) hours, from the Commission, law enforcement, and industry trace back consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

Empower Telecom has taken the following steps to prevent illegal originating robocall traffic:

Empower Telecom does not use a vendor for call analytics. Empower Broadband internally monitors all originating network traffic for suspicious or abnormal call volume or activity. Calls that meet the below qualifying factors are investigated internally to determine if the calls are legitimate or unlawful:

- Large bursts of calls in a short timeframe
- short duration calls
- low average call duration
- sequential dialing patterns
- neighbor spoofing patterns

Empower Telecom has taken the following steps to mitigate illegal originating robocalling traffic upon detection:

Empower Telecom will notify customers of detection of illegal activity and multiple violations will result in service termination.

Know your Customer

Empower Broadband has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Empower Broadband thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services.

Residential customers are asked to provide their full name, address (physical and mailing, if different), last four digits of their social security number, date of birth, phone number, email, and establish a security question, and a password. Empower Broadband also requires a photo ID for all new customers requesting voice service.

Business customers are asked to provide their full name, address (physical and mailing, if different), tax identification number, phone number, email, and establish a security question, and a password. To initiate an account change, a customer must provide their password or the answer to their security question prior to initiating a change. If the customer is unable to provide that information the customer service representative will call the customer back using the number they provided at account setup.

Upstream Provider Knowledge

Empower Broadband knows all the carriers from which it receives traffic and has confirmed that all the carriers are listed in the Robocall Mitigation Database. No provider is using (Company Name)'s network to carry or process a high volume of illegal traffic. Empower Broadband monitors incoming traffic from all connected carriers for suspicious call patterns indicative of illegal robocall activity. The connected carriers are made aware of any suspicious or illegal traffic and notified that, if the traffic does not cease, the calls may be blocked from entering (Company Name)'s network. In addition, Empower Broadband is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.

Robocall Mitigation Database Eligibility

Empower Broadband has not been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling. Empower Broadband has not been prohibited from filing in the Robocall Mitigation Database.