

KEYSTONE BROADBAND, LLC

ROBOCALL MITIGATION PLAN

Keystone Broadband, LLC is a voice service provider that offers VoIP services to its subscribers on a “resold” basis. Keystone Broadband LLC’s wholesale provider is Momentum Telecom, Inc. (“Momentum”), a provider of wholesale and retail VoIP and other telecommunication services throughout the United States.

Keystone Broadband, LLC relies on the robocall mitigation policies, procedures and safeguards instituted by Momentum. Keystone Broadband, LLC 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.

Know Your Customer Policies

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

Service Terms: Customers that use Keystone Broadband’s telephone service for any unlawful purposes, including unlawful robocalls, are subject to suspension or termination of service.

Use of Call Analytics to Identify and Block Unlawful Traffic

Keystone Broadband, LLC relies on Momentum’s 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 Keystone Broadband, LLC 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 Keystone Broadband, LLC receives a report or alert from Momentum of suspected unlawful robocall traffic originated by a Keystone Broadband, LLC customer, Keystone Broadband, LLC will initiate an investigation. If a customer is found to have violated Keystone Broadband, LLC's subscriber agreement, Keystone Broadband, LLC will take action, depending on the severity of the 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

Keystone Broadband, LLC upstream provider, Momentum, is a well-known, reputable wholesale service provider that is registered in the FCC's Robocall Mitigation Database. Keystone Broadband, LLC 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

Keystone Broadband, LLC 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 Keystone Broadband, LLC customers.

Keystone Broadband, LLC is also committed to cooperating with Momentum on traceback requests and to fully complying with the Commission's robocall blocking requirements. Keystone Broadband, LLC 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.