
Northwest Fiber, LLC dba Ziply Fiber Annual Certification:

In accordance with 47 CFR § 64.6305(a), Northwest Fiber, LLC and its operating companies have implemented a multi-layered robocall mitigation program designed to identify and prevent the origination of illegal robocalls. Our program combines automated traffic analytics, strict contractual enforcement, and manual oversight to ensure compliance with the TRACED Act.

In accordance with 47 CFR § 64.1200(n)(3) and to prevent new and renewing customers from using our network for illegal purposes, Northwest Fiber, LLC and its operating companies perform the following due diligence:

- Identity Verification: We require all business customers to provide a valid Tax ID (EIN) and a verifiable physical business address.
- Service Monitoring: Customers requesting greater than ten (10) of concurrent call paths are flagged for manual review to ensure their use case aligns with legal telemarketing or informational standards.
- No Residential High-Volume: We prohibit the provisioning of high-volume automated dialing capabilities to residential-class service lines.
- Caller Identification must be a number owned by the customer

In accordance with 47 CFR § 64.6305(a)(2), we employ a combination of a Neustar as well as our own proprietary analytics to monitor outbound traffic for patterns indicative of illegal robocalling, including:

- Short Duration Calls: Monitoring for high volumes of calls lasting less than 6 seconds.
- Low Completion Rates: Identifying spikes in amount of calls from same number in a short time period resulting in 'unanswered' or 'busy' signals.
- Invalid Caller ID: Automatically blocking or flagging traffic with unassigned or invalid NPANXX numbering.

In accordance with 47 CFR § 64.6305(g) Northwest Fiber, LLC and its operating companies commit to responding to all traceback requests from the FCC, law enforcement, or the Industry Traceback Group (ITG) within 24 hours of receipt. We have designated a Robocall Mitigation Point of Contact available at noc@ziply.com or (888) 488-0072 to handle these inquiries immediately.

Our Terms of Service (ToS) expressly prohibit the use of our network for illegal robocalling or spoofing. Upon receipt of a verified complaint or suspicious analytics report, Ziply Fiber Northwest, LLC reserves the right to suspend service within twenty-four (24) hours and terminate the account if the customer cannot provide proof of 'prior express written consent' for the traffic in question.

Business Name: Northwest Fiber, LLC and its operating companies

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Kirkland, WA 98033

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Signed



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