



ROBOCALL MITIGATION PLAN

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Skybeam, LLC dba Rise Broadband is headquartered in Greenwood Village, Colorado and provides fixed wireless broadband voice and data service to residential and business customers in 16 states. Rise Broadband's parent company, JAB Wireless, Inc., was incorporated in 2005.

PROCEDURES TO MITIGATE OR STOP ROBOCALLS

I. KNOW YOUR CUSTOMER

Rise Broadband follows the North American Numbering Council (NANC) - Call Authentication Trust Anchor Working Group guidelines and best practices for vetting caller identity [NANC CallerID Best Practices](#).

This includes confirming the identity of Rise Broadband customers – (i) contact person(s); (ii) business location; (iii) state or country of incorporation; (iv) federal tax identification; and (v) the nature of our customers' businesses.

Rise Broadband's services are targeted to residential and small business usage. These customers are configured for service either off systems that cannot generate more than a single call at a time or are otherwise limited in the number of concurrent calls that would render an illicit robocalling platform from operating in a cost-effective manner.

II. CONTRACTUAL TERMS

Customers using Rise Broadband services agree to abide by the rules and regulations set forth in our "Broadband Internet Acceptable Use Policy" and "Residential" and "Business General Terms and Conditions" ([Acceptable Use Policy Residential Terms of Use Business Terms of Use](#)). Rise Broadband's service agreement expressly prohibits customers/subscribers from engaging in illegal activity, including creating a false Caller ID (i.e. spoofing) and robocalling.

Rise Broadband will continue to vet each customer thoroughly. We will confirm the identity of new commercial customers to understand the nature of their business, including, if and/or how they will employ auto-dialers or other robocall tools in the conduct of their business.

Customers are informed that any suspicious activity will be investigated; and if the customer is engaging in, or has engaged in illegal robocalling, their service will be terminated.

III. TRACEBACK

Rise Broadband commits to respond fully, within 24 hours, to all traceback requests from the Commission, law enforcement, and the Registered Traceback Consortium. In the event illegal robocallers use our system, Rise Broadband will cooperate with such entities' investigation.

IV. ROBOCALL MITIGATION PLAN

Rise Broadband has taken the following actions to comply with the Robocall Mitigation Caller ID requirement:

Rise Broadband has the capability to mitigate robocalls using the mitigation methods listed below.

- Blacklists
 - Block calls by calling numbers or call prefixes
 - Block calls by SPIDs that are not customers of Rise Broadband
 - Block calls originating outside Rise Broadband's network or its customers' networks
 - Block IP addresses identified as SPAM or robocalls
 - Identify User agents that our customers do not use
- Call CAPTCHA
 - Call Detail Record (CDR) Analysis
 - Generate reports that identify high call volume, short call durations, and excessive calls to and from the same number
- Customer Controls
 - Call volume limits
 - Ability to block calls
 - Limit caller id to assigned telephone number

V. KNOW YOUR UPSTREAM PROVIDER

Rise Broadband has agreements in place with all service providers that facilitate its provision of voice services. Rise Broadband has confirmed that each of these service providers are listed in the Robocall Mitigation Database. Rise Broadband will not accept traffic from any carrier that is removed from the Robocall Mitigation Database.

VI. CALL ANALYTICS SYSTEMS

Rise Broadband has home-grown call analytics software and controls to help identify calls that are fraudulent and/or are violation of the company's acceptable user policy. We are always working to improve functionality of that software, but it is not our primary Robocall mitigation tool.

VII. PLAN UPDATES

Rise Broadband will continue to monitor industry best practices and improve our internal processes to ensure our systems adapt to address the ongoing challenges affecting this industry.