

ResortNet, LLC

ROBOCALL MITIGATION PLAN

ResortNet, LLC d/b/a ResortInternet (“ResortInternet”) is a service provider that offers Internet interconnected VoIP services to multi-dwelling unit (MDU) properties.

While ResortInternet necessarily relies on the robocall mitigation policies, procedures, and safeguards instituted by its wholesale VoIP service provider, Inteliquent, Inc. d/b/a Sinch, ResortInternet has also adopted this robocall mitigation plan to take its own measures to limit the potential for the origination of unlawful robocalls by its customers that would be carried and processed by Inteliquent and other downstream providers.

Know-Your-Customer Policies

Subscriber Vetting: ResortInternet vets the identity of its customers when approving an application and entering into an agreement to provide Internet and telephone services. ResortInternet’s services are provided to fixed locations and services are installed on location by its personnel, so ResortInternet knows the actual location of its customers. ResortInternet collects the customer’s name, address, and contact information. This information enables ResortInternet to validate the identity of potential customers prior to provisioning of service. Service will not be provided if a new customer’s identification cannot be verified. ResortInternet’s customers are typically MDUs that offer short-term housing for people on vacation. MDU tenants and guests are subject to the terms of ResortInternet’s Acceptable Use Policy (“AUP”).

Contractual Terms: ResortInternet’s Acceptable Use Policy (“AUP”) prohibits the use of its telephone service for unlawful acts or purposes. ResortInternet may terminate a customer’s service for violations of its terms. While ResortInternet will rely on its AUP to take action against the use of its services to disseminate unlawful robocalls, it should be noted that short-term vacation rental properties are unlikely to be a source of unlawful robocalling.

Use of Call Analytics to Identify and Block Unlawful Traffic

ResortInternet relies on Inteliquent’s use of call analytics systems to identify and block unlawful robocall traffic as set forth in Inteliquent’s robocall mitigation plan on file with the FCC.

If ResortInternet receives a report or alert from Inteliquent of suspected unlawful robocall traffic originated by a ResortInternet end user customer, ResortInternet will conduct an investigation. To the extent a customer is found to have violated terms, ResortInternet will take action commensurate with the severity of the customer’s offense, including, but not limited to, providing the customer with a warning or terminating the customer’s service without notice.

Knowledge of Upstream Providers

ResortInternet’s upstream provider Inteliquent is a well-known, reputable wholesale service provider that is registered in the FCC’s Robocall Mitigation Database. ResortInternet does not itself have knowledge or insight into the upstream providers from which Inteliquent receives traffic, but understands from its mitigation plan that its 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 the Traceback Group, Law Enforcement and Government Agencies

ResortInternet 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 ResortInternet customers.

ResortInternet is also committed to cooperating with Inteliquent on traceback requests and to complying with the Commission’s robocall blocking requirements. ResortInternet understands that its wholesale provider 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 a do-not-originate (DNO) list issued by ITG.