



Robocall Mitigation Plan

This robocall mitigation plan is for ULTIMATE INTERNET ACCESS, INC., with headquarters at 1300 Hwy 2, Wrightwood, CA, 92397.

We perform the following roles in the call chain:

- A voice service provider with a STIR/SHAKEN implementation obligation serving end-users

ULTIMATE INTERNET ACCESS, INC. has not been prohibited from filing a certification in the Robocall Mitigation Database.

ULTIMATE INTERNET ACCESS, INC. does not have a history of enforcement actions for illegal robocalls, TCPA or TSR violations, or related state law violations.

ULTIMATE INTERNET ACCESS, INC. uses the following affirmative, effective measures to prevent the origination or transit of illegal robocalls.

Know Your Customer

100% of our VOIP customers also have physical Internet connectivity through us. We therefore have full information of every single customer. We do not sell phone service to entities outside of our connectivity. The one exception to this is if our customer on our physical connectivity has a person working remotely. In that case we still have all the information for that person's location and control over their calling. Any practice of Robocalling would be a violation of our Terms of Service, and would result in terminating VOIP service to that customer. Because every one of our VOIP customers is on our physical connectivity, and therefore known to be a legitimate business, we have had zero incidents of Robocalls.

Know Your Upstream Provider

We confirm that the upstream provider has a certification in the Robocall Mitigation Database. We will not accept voice traffic from an unregistered provider.

Both VOIP Innovations and Commio, our two providers, are in good standing in the Robocall Mitigation Database.

Traceback

We respond within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium. We cooperate fully with such entities in investigating and stopping any illegal robocallers that use our service to originate, carry, or process illegal robocalls.

Robocall Mitigation Program

We use call analytics software provided by TransNexus to monitor all outbound voice traffic in real-time to prevent the origination or transit of illegal robocalls.

The software provides detailed reporting to identify suspected illegal robocalls. The system alerts us if we process outbound calls where the calling number has a poor reputation or is invalid, unallocated, or on a Do Not Originate list.

We immediately investigate any identified suspicious calls to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls. If we determine that the traffic was likely unlawful, then we warn them to stop sending such traffic. If they continue to send traffic that appears to be unlawful, then we terminate their service.

STIR/SHAKEN

We have registered with the STI-PA using OCN 269K. We have our own STIR/SHAKEN certificate issued by the TransNexus Certification Authority (STI-CA) that we use when authenticating calls we originate. We have implemented a STIR/SHAKEN solution supplied by TransNexus.