



ROBOCALL MITIGATION PLAN

COMPANY OVERVIEW

Wisper Internet ("Wisper") is a wireless Internet service provider operating in Arkansas, Illinois, Indiana, Kansas, Missouri, and Oklahoma.

VOIP SERVICES OVERVIEW

Wisper operates no self-hosted phone systems. It is a sole reseller of a white labeled services provided by Momentum Telecom Inc. ("Momentum") and VoIP Innovations, LLC ("VoIP Innovations"). Wisper does not control the softswitch, number porting, or call trunking for the associated calls. Accordingly, Wisper does not have the facilities necessary to implement STIR/SHAKEN. Wisper has, however, adopted this robocall mitigation plan to establish procedures intended to limit the potential for the origination, carrying, or processing of unlawful robocalls from its voice services.

PROCEDURES TO MITIGATE OR STOP ROBOCALLS

I. TRACEBACK

Wisper 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, Wisper will cooperate with such entities' investigation.

II. KNOW YOUR CUSTOMER

Wisper: Wisper follows the North American Numbering Council (NANC) - Call Authentication Trust Anchor Working Group guidelines and best practices for vetting caller identity [NANC Caller ID Best Practices](#). This includes confirming the identity of Wisper 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.

Momentum: Before providing VoIP services, Momentum vets the identity of its wholesale customers. Momentum collects the wholesale customer's business name and address, physical location, contact information, jurisdiction of incorporation, federal tax ID, FCC Form 499 identification number and federal Universal Service Fund contributor status, and the nature of the wholesale customer's business.

CONNECTING COMMUNITIES



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VoIP Innovations: Requires all new customers to complete a verification process that includes a live phone call with a support representative to confirm 1) the customer is who they say they are and 2) they represent the company they have signed up on behalf of.

III. KNOW YOUR UPSTREAM PROVIDER

Wisper solely resells phone service provided by Momentum and VoIP Innovations. These vendors were chosen because of factors such excellent industry reputation, compliance with state and federal regulations, and commitment to technological best practices. But since any system is at risk of being misused, Wisper employees who detect irregularities in Momentum or VoIP Innovations' phone systems are advised to investigate the issue or escalate it for review. Wisper has confirmed that Momentum and VoIP Innovations are listed in the Robocall Mitigation Database.

IV. ACCEPTABLE USE

Wisper: Wisper customers agree to abide by the rules of our Acceptable Use Policy (<https://wisperisp.com/policies>). The Policy expressly prohibits customers/subscribers from engaging in illegal activity, including creating a false Caller ID (i.e. spoofing) or violating the Telephone Consumer Protection Act. Customers are informed that any suspicious activity will be investigated. If the customer is engaging in, or has engaged in illegal robocalling, their service may be terminated without prior notice.

Momentum: Momentum users are obliged to follow the company's Acceptable Use Policy (<https://gomomentum.com/acceptable-use-policy/>) which prohibits activities that are deceptive, fraudulent, and otherwise apply to abusive robocall activities.

VoIP Innovations: All VoIP Innovations subscribers are expressly prohibited from using the system in a manner that involves illegal robocalling.

V. CONCURRENT CALL RESTRICTIONS

Momentum and VoIP Innovations services resold by Wisper are targeted to residential and small business usage. These customers are assigned to systems that either cannot generate more than one call at a time or are otherwise configured to limit the number concurrent calls. Such limitations make it impractical for customers to use these phone systems for robocalls in a cost-effective manner.

VI: CALL ANALYTICS

As the provider of white labeled services, Momentum and VoIP Innovations are primarily responsible for implementing and monitoring call analytics intended to detect robocalls.

Wisper relies upon Momentum's and VoIP Innovations' call analytics systems to identify unlawful traffic originated by its retail customers and the end users of its wholesale customers' services.

Wisper: Wisper does not host its own phone infrastructure and does not have dedicated phone analytics. But in its role as ISP, if we are given traceback information that shows a Wisper-owned IP was involved with robocalling, we can determine which customer is tied to the fraudulent behavior.

Momentum: Momentum's call analytics can detect call patterns that indicate robocall activity, including, but not necessarily limited to, an unusually 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. Momentum's call analytics also can detect where the calling number is invalid, unallocated, or on ITG's Do Not Originate ("DNO") list. If Momentum's call analytics detect any of the above-described issues, an internal report is generated that summarizes the issues presented and the applicable wholesale or retail customer that is responsible for the underlying calls.

In the event that Momentum's analytics report indicates potential illegal robocall activity by a wholesale end user customer, Momentum alerts the wholesale customer's contact representative and asks the customer to investigate the issue and thereafter inform Momentum: (i) when the issue is resolved and (ii) what actions the wholesale customer took in resolving the issue.

In the event that Momentum's analytics report indicates potential illegal robocall activity by one of its own retail customers, Momentum conducts its own investigation into the customer and the calls at issue. After concluding its investigation, Momentum 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 and/or reporting the misconduct to the appropriate authorities.

VoIP Innovations: VoIP Innovations continuously monitors calling patterns in and out of their network to identify fraudulent traffic, including robocalling, traffic pumping, and international toll fraud. VoIP Innovations will block services to a customer if it determines that the customer is using the services for any illegal activities, including robocalling.

VII. PLAN UPDATES

Wisper 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.