

CAL.NET, INC. ROBOCALL MITIGATION PLAN

Cal.net, Inc. (“Cal.net”) is a small rural broadband service provider operating in California and offers fully STIR/SHAKEN compliant facilities-based fixed VoIP services to residential and business customers.

Main Street Mobile (“Main Street”) is the d/b/a name of Cal.net, Inc.’s mobile virtual network operator (“MVNO”) service, which offers mobile voice and data services to Cal.net’s Internet subscribers.

Business name and primary address:

Cal.net, Inc.
4101 Wild Chaparral Drive
Shingle Springs, CA 95682

Other business names and names previously used: Main Street Mobile, Cal.net

Cal.net is not a foreign voice service provider.

Name, title, department, business address, telephone number, and email address of one person within the company responsible for addressing robocall mitigation-related issues:

Wayne Hamilton, Expansion Engineering Manager
Engineering Department
Cal.net, Inc.
4101 Wild Chaparral Drive
Shingle Springs, CA
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whamilton@corp.cal.net

Cal.net’s OCN: 087J

Cal.net’s VoIP Operations

Cal.net has implemented and complies with the following robocall mitigation program for its VoIP network:

- Know Your Customer: Prospective new voice service customers must speak with a Cal.net customer service agent to order voice services; there is no mechanism allowing voice service initiation without that human touch. Cal.net obtains the name and physical location of all subscribers prior to initiating service. Additionally, Cal.net thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services.

- Cal.net’s written terms of service prohibit any subscriber from inappropriate usage of Cal.net’s services, including but not limited to the transmission of any data which violates any federal, state or local regulation. Cal.net reserves the right to terminate service for failure to comply with its terms of service.
- Know Your Upstream Provider: Cal.net connects to the Public Switched Telephone Network through one third-party SIP origination/termination service providers. This party is compliant with STIR/SHAKEN and only accepts network traffic from carriers that are in the Robocall Mitigation Database. This party is contractually obligated to perform the robocall mitigation functions for Cal.net voice traffic.
- Cal.net’s VoIP subscribers can only use telephone numbers obtained from Cal.net to originate and terminate telephone calls.
- Cal.net shall respond fully within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.
- Cal.net utilizes the capabilities of its upstream voice provider, VoIP Innovations, to identify and block illegal traffic, which includes:
 - Continuously monitoring calling patterns in and out of its network to identify fraudulent traffic, including robocalling, traffic pumping, and international toll fraud.
 - Blocking services to a customer if it determines that the customer is using the services for any illegal activities, including robocalling. Such customer’s agreement will be terminated if the violation is determined to be intentional.

Main Street’s MVNO Operations

As a non-facilities-based MVNO, Main Street is not required to fully or partially implement STIR/SHAKEN due to its lack of control over the network infrastructure necessary to implement STIR/SHAKEN and because it is “incapable of obtaining an SPC token due to Governance Authority policy.” 47 C.F.R. §§ 64.6304(b), 64.6305(d)(2)(i).

For its Main Street voice services, Cal.net has implemented and complies with the following robocall mitigation program:

- Know Your Customer: Prospective new MVNO voice service customers must speak with a Cal.net customer service agent to order voice services; there is no mechanism allowing voice service initiation without that human touch. Cal.net obtains the name and physical location of all subscribers prior to initiating service. Additionally, Cal.net thoroughly vets

new residential and business customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services.

- Cal.net's written terms of service, including for its Main Street MVNO service, prohibit any subscriber from inappropriate usage of Cal.net's services, including but not limited to the transmission of any data which violates any federal, state or local regulation. Cal.net reserves the right to terminate service for failure to comply with its terms of service.
- Know Your Upstream Provider: Cal.net connects to the Public Switched Telephone Network through one upstream provider, which has filed a robocall mitigation plan that explains it has fully implemented its STIR/SHAKEN obligations. Further, the underlying facilities-based wireless carrier, on whose network the Main Street voice traffic is transported, has also filed a robocall mitigation plan explaining it has fully implemented its STIR/SHAKEN obligations.
- Cal.net shall respond fully within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

No prior Cal.net robocall certification has been removed by Commission action and it has not been prohibited from filing in the Robocall Mitigation Database. At no time in the prior two years has Cal.net been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to Cal.net transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing or a deficient Robocall Mitigation Database certification or mitigation program description.

Respectfully Submitted,

/s/

John D. Barker

Chief Financial Officer

Cal.net, Inc.