

Zito West Holdings, LLC Robocall Mitigation Plan

Zito West Holdings, LLC, on behalf of itself and its affiliates identified below (together, “Zito”), have adopted this robocall mitigation plan setting forth specific, reasonable measures to attempt to limit the potential for the originating, carrying, or processing of unlawful robocalls from or on its network in connection with the provision of interconnected VoIP services to retail customers.

Know-Your Customer Policies

Zito vets the identity of prospective and existing telephone customers when: (i) approving an application for service; (ii) provisioning network connectivity; (iii) entering into a contract; or (iv) granting the right to use telephone number resources. Zito collects their name and address, physical location, and contact information. Zito’s Policy is to request additional information if Zito cannot validate the customer based on the initial information provided. Zito will not provide service if a new customer’s identification cannot be verified. Zito or its agents visit each new customers premises to install services.

Through its retail terms of service, Zito prohibits the use of its services for unlawful purposes and allows the company to terminate services immediately and without notice for unlawful use.

Knowledge of Upstream Providers

All calls terminated to Zito’s customers are either received from Zito’s other on-net end users or from one of three well-known upstream providers that are listed in the FCC’s Robocall Mitigation Database with comprehensive robocall mitigation policies and certifications of full STIR/SHAKEN implementation. In accordance with their representations, it is expected that these providers block calls dialed to a Zito end user (1) from sources that are identified in any FCC public notice or order requiring blocking, or from substantially similar traffic; (2) that include a caller ID number or name that is on Do-Not-Originate (DNO) list issued by the Industry Traceback Group (ITG); and (3) from foreign providers and gateway providers that have not registered in the Robocall Mitigation Database.

Use of Call Analytics to Identify and Block Unlawful Traffic

Zito is a facilities-based provider serving local communities that it knows, and VoIP customers are served over Zito’s private networks and VPNs that Zito controls from the platform to each client. Most customers are limited to a number of concurrent calls they can make (or receive), and Zito generally does not sell telephone services to customers who engage in large outbound call campaigns. Zito is therefore an unlikely source of significant outbound unlawful robocalling. Nonetheless, Zito engages in network monitoring and call analytics to identify such patterns of unlawful traffic originated by its customers. Traffic patterns indicative of robocalling, such as 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 will stand out more in Zito's network than with service providers serving different customer base profiles. Zito uses the VoipMonitor system that identifies suspect traffic and creates reports and alerts. In the event that Zito finds evidence of potential illegal robocall activity by one of its customers, Zito would conduct its own investigation and take appropriate action that may include warnings, termination of service, and reporting unlawful conduct to law enforcement.

Zito's outbound calls to telephone numbers outside of its network are delivered through the same three upstream carriers referenced above. These companies know how to reach Zito's robocall mitigation team at its Network Operations Center regarding suspected unlawful robocall traffic originating from Zito's network or a traceback request as described below.

Zito employs a STIR/SHAKEN solution to authenticate its originating calls using iconectiv and Sansay to provide attestation. Zito does not use other third parties to engage in call analytics to block robocalls.

Do-Not-Originating (DNO) Lists

Zito voice platform only allows customers to use numbers assigned to them for callerid when originating calls. All other numbers are considered invalid. Zito does maintain a list of unused numbers they hold in reserve which have been purchased from CLEC's (Bandwidth, Sinch and Lumen). Unused numbers in Zito's system can't be used by Zito customers for call origination. The only exception to this is when a customer needs to forward a call and want to keep the originating calling number for identification to the new destination.

Other Measures

Zito offers to its customers the ability to block incoming calls from specified telephone numbers.

Cooperation with Traceback Requests

Zito is committed to responding fully and within twenty-four hours to all traceback requests made by the Industry Traceback Group, law enforcement authorities, and government agencies to investigate and address suspected unlawful robocalls originated or passed to Zito.

Affiliates Covered by this Robocall Mitigation Plan

This plan applies to Zito West Holdings, LLC's parent company (Treasure Lake LP) and its following subsidiaries:

Zito Media Voice, LLC

St. Marys Television, Inc. (St. Marys) and its wholly owned subsidiary Zito Alabama, LLC

Zito Canton, LLC
Zito Central Pennsylvania, LLC
Zito Media Communications, LLC
Zito Media Communications II, LLC (ZMC II)
Zito Midwest, LLC
Zito NCTNWVPANOH, LLC
Zito Networks, LLC
Zito New York, LLC
Zito Georgia, LLC
Zito Elko, LLC
Zito Mifflin County, LLC
Country Cablevision, LLC
Pinpoint Minnesota, LLC
Wending Creek 3656, LLC
Zito Nevada, LLC
Zito Southern California, LLC