

Tulahoma Utilities Authority d/b/a LightTube
ROBOCALL MITIGATION PLAN

Tulahoma Utilities Authority d/b/a TUB (“TUB”) is a broadband provider that offers interconnected VoIP services to its subscribers on a resold basis. TUB’s wholesale VoIP provider is Momentum Telecom, Inc. (“Momentum”), which is registered in the Robocall Mitigation Database and performs first-party STIR/SHAKEN authentication on calls originated by TUB’s end-user customers. TUB does not have an obligation to implement STIR/SHAKEN because it lacks the facilities necessary to implement STIR/SHAKEN.

While TUB necessarily relies on Momentum’s robocall mitigation policies, procedures, and safeguards, TUB 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 Momentum or other downstream providers.

Know-Your-Customer Policies

Subscriber Vetting:

TUB thoroughly vets the identity of its residential and business customers when approving an application and entering into an agreement to provide telephone service. Service will not be provided if a new customer’s identification cannot be verified. TUB’s services are provided to fixed locations and services are installed on location by its personnel, so TUB knows the actual location of its customers. TUB collects social security numbers and checks a government-issued photo identification from residential customers, and collects employer identification numbers (EINs) from commercial customers, at the time of initiation of electric utility services. If telephone services are added later, the customer is re-verified through a check of photo identification, residential customers are asked to provide their full name, address (physical and mailing, if different), phone number, email, and establish a security question, and a password, and business customers are asked to provide their full name, address (physical and mailing, if different), tax identification number, phone number, email, and establish a security question, and a password.

Contractual Terms: TUB’s terms of service require that “use of the Service by you and any other User will at all times comply with all applicable laws, regulations and written and electronic instructions for use” and that “TUB reserves the right to terminate affected Services if TUB determines that such use does not conform with the requirements set forth in these Terms & Conditions, the Acceptable Use provisions, interferes with TUB’s ability to provide Services to you or others, or receives notice from anyone that your or Users’ use may violate any laws or regulations.”

Use of Call Analytics to Identify and Block Unlawful Traffic

TUB relies on Momentum’s use of call analytics systems to identify and block unlawful robocall traffic as set forth in its robocall mitigation plans on file with the FCC. Momentum reports that its call analytics can detect call patterns that indicate robocall activity, including, but not necessarily limited to, an unusual 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, and calling numbers that are invalid, unallocated, or on the Industry Traceback Group's Do Not Originate ("DNO") list.

If TUB receives a report or alert from Momentum of suspected unlawful robocall traffic originated by a TUB end user customer, TUB will conduct an investigation and will work internally to identify the party that is potentially originating illegal robocalls. To the extent a customer is found to have violated terms, TUB 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.

Knowledge of Upstream Providers

TUB's upstream provider Momentum is a well-known, reputable wholesale service provider that is registered in the FCC's Robocall Mitigation Database. TUB does not itself have knowledge or insight into upstream providers from which Momentum 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

TUB 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 TUB customers.

TUB is also committed to cooperating with its wholesale provider on traceback requests and to fully complying with the Commission's robocall blocking requirements. TUB understands that Momentum 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 DNO list issued by ITG.