



ROBOCALL MITIGATION PLAN

Summary

The City of Morganton (dba CoMPAS X-STREAM, CoMPAS Cable) is a municipal provider of broadband Internet access serving its community that offers interconnected VoIP services. This document details the efforts taken by the City to comply with FCC regulations related to robocall mitigation and call authentication.

Know-Your-Customer

Subscriber Vetting: The City of Morganton knows its customers and vets the identity of its customers when approving an application and entering into a contract for telephone service. The City's services are provided to fixed locations within The City of Morganton using its own network and services are typically installed on location by its personnel, so The City of Morganton knows the actual location and identity of its customers. The City collects the customer's legal name and contact information. All of this information enables The City of Morganton to validate the identity of potential customers prior to provisioning of service, and it will not provide service if a new customer's identification cannot be verified.

Service Terms: Customers that use the City's telephone service for any unlawful purposes, including unlawful robocalls, are subject to suspension or termination of service.

Use of Call Analytics to Identify and Block Unlawful Traffic

The City of Morganton necessarily relies on its wholesale and STIR/SHAKEN provider, Momentum Telecom, for the use of call analytics systems to identify and block unlawful robocall traffic. If the City of Morganton receives a report or alert from Momentum of suspected unlawful robocall traffic originated by its end user customer, the City will promptly investigate and respond. If the City determines that the caller was attempting to originate unlawful robocalls, then it will either warn them to stop or terminate their service as appropriate.

Knowledge of Upstream Providers

The City of Morganton incorporates by reference the measures implemented by Momentum Telecom to know its upstream providers, as reflected in Momentum's Robocall Mitigation Plan. Momentum has confirmed that each of those carriers are listed in the Robocall Mitigation Database.

Cooperation with the Traceback Group, Law Enforcement and Government Agencies

The City 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 its customers. All requests should be directed to support@compasxstream.com. Upon receiving such notice, the City of Morganton will promptly investigate and respond. If the City determines that the caller was attempting to originate unlawful robocalls, then it will either warn them to stop or terminate their service as appropriate.