

Fiberwave Technologies Robocall Mitigation Plan

Fiberwave Technologies, LLC, (“Provider”) submits this Robocall Mitigation Plan pursuant to 47 C.F.R. § 64.6305, as adopted by the Federal Communications Commission (FCC) requiring “voice service providers” to establish a “robocall mitigation plan”. This document sets forth Provider’s current policies and procedures designed to reduce or eliminate outbound illegal robocalls originating on its network. These policies and procedures constitute Provider’s “reasonable steps” to avoid the origination of illegal robocalls on its network. Provider further commits to reasonably responding to traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG), and to cooperate with such entities in investigating and stopping any illegal robocallers that may attempt to use its service to originate calls.

STIR/SHAKEN PROCEDURE

Provider monitors all calls for suspicious call patterns and disconnects trunks that have out of the ordinary calls, and implements call filtering and verify calls are from customers TN and caller ID.

TRACEBACK REQUESTS

Provider shall cooperate with the FCC, law enforcement and the (“ITG”) on all traceback requests and investigations, and shall timely and comprehensive respond to law enforcement’s efforts against illegal robocallers. Provider will dedicate sufficient resources to promptly complete and provide responses to all reasonable traceback requests received from the FCC, law enforcement and/or the ITG, and commits to fully responding to any traceback 2 request received within 24 hours after receiving the same.

Traceback Contact:
Name: Dean North
Title: COO
Phone Number: 801-710-1920
Email: dean@fiberwavetech.com

CUSTOMER VETTING PROCESS

As a means of preventing or minimizing origination of illegal robocalls via voice services, Provider will use best practices in vetting the identity of all of its voice service subscribers -i.e., residential or business/commercial subscriber (including entities purchasing the Provider’s services for resale). Such process is intended to help determine the legitimacy of a customer prior to establishing a service relationship. Normally, Provider looks to confirm the identify of a voice service customer by collecting

information such as customer's physical location, contact person(s), state or country of incorporation, federal tax ID, and the nature of the customer's business. Provider efforts to vet retail and business/commercial subscribers transpires during the process of provisioning the requested services. For instance, in appropriately sizing the facilities to customer's claimed intended use, executing Provider's required service agreement, and granting customer the right to use telephone number resources. Certain commercial customers may present a higher risk of perpetrating illegal robocalls. Provider may subject such customers to a more stringent background check and possibly a site visit.

In an effort to meet the existing obligation to take affirmative, effective measures to prevent new and renewing customers from originating illegal calls, Provider shall:

- Utilize service agreements and acceptable use policies to prevent new and existing subscribers from using their voice and broadband services in ways that would be in violation of local, state, or federal laws, or to engage in deceptive or fraudulent activity. The documents governing use of Provider's services include terms requiring customers to not use services to make illegal robocalls.
- Reserve the right to suspend and/or terminate a subscriber's voice service for violating applicable service-related terms.
- Establish a process for monitoring the usage and quality of its network facilities and conduct recurring and timely reviews of its call detail records ("CDRs") to facilitate early identification of unusual or suspicious call activity or patterns indicating illegal robocalls.
- In instances where Provider identifies activity or a pattern consistent with illegal robocalls the customer will be contacted within twenty-four hours for further investigation and possible action regarding use of voice service.

TELEPHONE NUMBER VALIDATION PROCESS

Telephone Number Validation refers to the confirmation of the customer or end-user right to use a telephone number in connection with their subscribed voice service(s). In accord with industry best practices, Provider has procedures in place to confirm the calling customer's right to use a telephone number. Specifically, a subscriber is permitted to use a telephone number as their caller identity if a number is directly managed by Provider and/or obtained by Provider via an underlying partner. For: (i) single line voice service subscribers, both services connected via TDM

or IP, the switching equipment has been set up to only accept calls from the number assigned to that subscriber; and (ii) subscribers with multi-line telephone systems, for both services connected via TDM or IP, the Provider screens all originating calls and only allows calls to be connected if the originating number matches one of the numbers assigned to the subscriber. These screening capabilities enable an automated and secure method of validating originating telephone numbers.

INTERNATION CALLS

Provider is not currently an international voice services provider. If Provider sells services to customers which are international call originators using North American Numbering Plan resources Provider will familiarize itself with and develop best practices for fulling vetting such customers and performing telephone number validation on all international originated calls.