

BOROUGH OF KUTZTOWN DBA HOME NET

ROBOCALL MITIGATION PLAN

The Borough of Kutztown is a Pennsylvania municipality that provides broadband Internet access to its community under the brand Home Net. Home Net also offers interconnected VoIP services to its subscribers on a resold basis. Home Net's wholesale VoIP provider is Momentum Telecom, Inc. ("Momentum"), a provider of wholesale and retail VoIP and other communications services across the United States.

While Home Net necessarily relies on the robocall mitigation policies, procedures, and safeguards instituted by Momentum, Home Net 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 and other downstream providers.

Know-Your-Customer Policies

Subscriber Vetting: Home Net vets the identity of its customers when approving an application and entering into contracts for telephone service. As part of this vetting process, Home Net collects the customer's legal name and address, physical location, and contact information, and may require additional information to validate the customer. Home Net's services are provided to fixed locations using its own network and services are typically installed on location by its personnel, so Home Net knows the actual location of its customers. All of this information enables Home Net to validate the identity of potential customers prior to provisioning of service. Home Net will not provide service if a new customer's identification cannot be verified.

Contractual Terms: Home Net's Residential Use of Service and Device agreement ("Subscriber Agreement") prohibits the use of its telephone service for any unlawful purposes, including without limitation auto-dialing, continuous or extensive call forwarding, telemarketing (including without limitation, charitable or political solicitation or polling), fax or voicemail broadcasting, or fax or voicemail blasting. Home Net may immediately disconnect or modify the service if it determines, in its sole discretion, that the customer's use of the service has violated these restrictions or is inconsistent with normal residential usage patterns.

Use of Call Analytics to Identify and Block Unlawful Traffic

Home Net relies on Momentum's use of call analytics systems to identify and block unlawful robocall traffic as set forth in Momentum's robocall mitigation plan on file with the FCC. Momentum reports that the call analytics it employs for Home Net's traffic 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 Home Net receives a report or alert from Momentum of suspected unlawful robocall traffic originated by a Home Net end user customer, Home Net will conduct an investigation. To the extent a customer is found to have violated Home Net's Subscriber Agreement, Home Net 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 without notice.

Knowledge of Upstream Providers

Home Net's upstream provider, Momentum, is a well-known, reputable wholesale service provider that is registered in the FCC's Robocall Mitigation Database. Home Net does not itself have knowledge or insight into the upstream providers from which Momentum receives traffic, but understands from Momentum's mitigation plan that Momentum's 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

Home Net 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 Home Net customers.

Home Net is also committed to cooperating with Momentum on traceback requests and to fully complying with the Commission's robocall blocking requirements. Home Net 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.