

Communications Construction Services, Inc.

ROBOCALL MITIGATION PLAN

Communications Construction Services, Inc. (“CCS”) is a service provider that offers interconnected VoIP services to its subscribers on a resold basis. CCS’s wholesale VoIP provider is Momentum Telecom, Inc. (“Momentum”), which is registered in the Robocall Mitigation Database.

While CCS necessarily relies on Momentum’s robocall mitigation policies, procedures, and safeguards, CCS 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: CCS vets the identity of its customers when approving an application and entering into an agreement to provide telephone service. CCS’s services are provided to fixed locations and services are installed on location by its personnel, so CCS knows the actual location of its customers. CCS provides its specialized services to a small number of customers, such as the U.S. military, and knows the identity of its customers prior to provisioning of service. Service will not be provided if a new customer’s identification cannot be verified.

Contractual Terms: CCS’s terms of service prohibit the use of its telephone service for fraudulent or unlawful acts or purposes and prohibits customers from falsifying calling party identification information. CCS may terminate a customer’s service for violations of its terms.

Use of Call Analytics to Identify and Block Unlawful Traffic

CCS 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 CCS receives a report or alert from Momentum of suspected unlawful robocall traffic originated by a CCS end user customer, CCS will conduct an investigation. To the extent a customer is found to have violated terms, CCS 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

CCS’s upstream provider Momentum is a well-known, reputable wholesale service provider that is registered in the FCC’s Robocall Mitigation Database. CCS 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

CCS 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 CCS customers.

CCS is also committed to cooperating with its wholesale provider on traceback requests and to fully complying with the Commission’s robocall blocking requirements. CCS understands that its wholesale provider 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.