



Connect 2 First Internet, LLC

Robocall Mitigation Plan

The FCC has prioritized the protection of consumers against illegal and spoofed robocalls. All voice service providers are required to file certifications in the Robocall Mitigation Database regarding efforts to fight illegal robocalls. This document describes the steps Connect 2 First Internet, LLC (C2F) is taking to address rules adopted in the Federal Communications Commission's (FCC) *Sixth Caller ID Authentication Report and Order* (Sixth Report and Order and Further Notice of Proposed Rulemaking, FCC-23-18 (March 17, 2023)) and in 47 CFR § 64.6305, Robocall mitigation and certification.

As a VOIP service provider, C2F utilizes an underlying voice service provider. C2F management is committed to utilizing vendors and suppliers that comply with all federal and state regulations and has selected the Alianza platform as the provider of those services.

STIR/SHAKEN

Alianza, Inc. is listed as an authorized provider on the STI-PA list and is compliant with STIR/SHAKEN regulations implemented in the TRACED Act. Alianza has filed certification on the FCC's Robocall Mitigation Database along with a detail of the controls and procedures in place.

Traceback

C2F will respond within 24 hours to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to carry or process calls.

Robocall Mitigation

C2F's Terms of Service prohibit auto-dialing and robocalling and allow for immediate termination of service if such activity is identified. New business phone customers will be asked to provide additional information on their business activities to determine if there are any valid and legal reasons that the customer could have unusual system activity.

C2F relies on Alianza's system analytics and safeguards to detect and prevent illegal robocalls. Our Master Services Agreement with Alianza authorizes them to immediately terminate services to any subscriber or device to prevent fraudulent or illegal activities (Item 9.2). If a subscriber is identified by Alianza as the source of potentially fraudulent activity, C2F will investigate the subscriber activity and terminate service if necessary.

Management will periodically confirm Alianza's certifications are current and that they meet the latest regulations. C2F staff should stay informed of rules and follow up with Alianza on any changes as they are released.

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