

PEOPLES UTILITY CORPORATION.

ROBOCALL MITIGATION PLAN

Peoples Utility Corporation. (“Peoples Utility”) provides is a competitive provider of retail small business and enterprise VoIP services utilizing Momentum Telecom, Inc as our underlying provider of VoIP services. The company also provides broadband monitoring, provisioning, and managed support services.

As a non-facilities based reseller, we have no implementation of STIR/SHAKEN, Peoples Utility has adopted this robocall mitigation plan to take its own measures to limit the potential for the originating, carrying, or processing of unlawful robocalls from or on its network. As Momentum Telecom, Inc is our sole underlying VoIP provider, we will utilize their network for all traffic which as implemented STIR/SHAKEN on the network.

Know-Your Customer Policies

Retail Services:

Peoples Utility vets the identity of the customers to whom it provides retail VoIP service when: (i) approving an application for service; (ii) provisioning network connectivity; (iii) entering into a contract agreement; or (iv) granting the right to use telephone number resources. Peoples Utility collects from retail customers their name and address, physical location, contact information, and, for business and enterprise customers, their jurisdiction of incorporation, federal tax ID, and nature of business. Peoples Utility may also utilize third-party agencies to gauge credit and/or fraud risk associated with a potential customer. Peoples Utility’s policy is to request additional information from the customer if Peoples Utility cannot validate the customer based on the initial information provided. Peoples Utility will not provide service if a new customer’s identification cannot be verified.

Through its retail terms of service, Peoples Utility requires its enterprise customers to comply with all applicable laws in relation to its voice services, explicitly prohibiting any abusive or unlawful use of the service:

Fair Use. Peoples Utility reserves the right to review usage of all its plans to ensure you are not abusing them. You agree to use the Service for normal voice or fax calls and will not employ methods or equipment to take advantage the Service by using the voice or fax services excessively or for means not intended by Peoples Utility. If Peoples Utility determines, in its reasonable discretion, that you are abusing its plans, Peoples Utility may terminate Service after providing you with thirty (30) days’ written notice and reasonable proof, with the opportunity to cure. For the purpose of clarity, but in no way limiting the definition of abusive use of the Service, auto-dialers, continuous call session connectivity, fax broadcasting, fax blasting, mass calling or any other blasting activities are conclusively presumed to be abusive use of the Service. If Peoples Utility has reasonable evidence that Customer may be in violation of the foregoing prohibitions, Peoples Utility in its reasonable discretion may take curative action that may

result in the modification, suspension or cancellation of some or all of your Service after providing you with ten (10) days' written notice with the opportunity to cure.

Prohibited Uses. You agree to abide by Peoples Utility's Acceptable Use Policy which is provided to the customer at time of entering into service agreement. You shall not use the Service and the Equipment in any unlawful or improper manner, including, without limitation, conduct that is threatening, abusive, harassing, defamatory, libelous, deceptive, fraudulent, invasive of another's privacy. We reserve the right to disconnect your Service, if, after investigation and in our reasonable discretion, we determine that you have used the Service or the Equipment in any such manner. We shall use commercially reasonable efforts to provide Customer with notice and evidence of such unlawful or improper use prior to any such disconnection. Although we will limit such disconnection to the specific Customer Location(s) involved if commercially reasonable to do so, we reserve the right to disconnect Service generally as circumstances may require in our reasonable discretion. In the event of such disconnection, and upon our providing you with reasonable proof of the unlawful or improper use, you will be responsible for the liquidated damages and other charges as set forth in Section 4.4 hereof. If we believe that you have used the Service or the Equipment in an unlawful or improper manner, we may forward the relevant communication and other information, including your identity, to the appropriate authorities for investigation and prosecution. You hereby consent to our forwarding of any such communications and information to these authorities. In addition, we will provide information in response to law enforcement requests, lawful government requests, subpoenas, and court orders and in the case where failure to disclose the information may lead to imminent harm to the Customer or others. Furthermore, we reserve all its rights at law and equity to proceed against anyone who uses the Service illegally or improperly.

To the extent a customer is found to have violated its contractual obligations for the reasons noted previously or any other reason, Peoples Utility 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 and/or reporting the misconduct to the appropriate authorities.

Use of Call Analytics to Identify and Block Unlawful Traffic

Peoples Utility has implemented its own call analytics to identify unlawful traffic originated by its retail customers and the end users of its wholesale customers' services. Peoples Utility's call analytics can detect call patterns that indicate robocall activity, including, but not necessarily limited to, an unusually 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. Peoples Utility's call analytics also can detect where the calling number is invalid, unallocated, or on ITG's Do Not Originate ("DNO") list. If Peoples Utility's call analytics detect any of the above-described issues, an internal report is generated that summarizes the issues presented and the applicable wholesale or retail customer that is responsible for the underlying calls.

In the event that Peoples Utility's analytics report indicates potential illegal robocall activity by a

wholesale end user customer, Peoples Utility alerts the wholesale customer's contact representative and asks the customer to investigate the issue and thereafter inform Peoples Utility: (i) when the issue is resolved and (ii) what actions the wholesale customer took in resolving the issue.

In the event that Peoples Utility's analytics report indicates potential illegal robocall activity by one of its own retail customers, Peoples Utility conducts its own investigation into the customer and the calls at issue. After concluding its investigation, Peoples Utility 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 and/or reporting the misconduct to the appropriate authorities.

Knowledge of Upstream Providers

Peoples Utility knows all of the upstream providers from which it directly receives traffic and has insight into its upstream providers' policies and procedures related to identifying and blocking unlawful robocall traffic through Peoples Utility's review of these providers' robocall mitigation plans. Peoples Utility confirms that all upstream providers from which it receives traffic are listed in the FCC's Robocall Mitigation Database.

Cooperation with the Traceback Group, Law Enforcement and Government Agencies

Peoples Utility is committed to responding fully and within 24 hours to all traceback requests made by ITG, law enforcement authorities, and government agencies to investigate and address suspected unlawful robocalls originated or passed to Peoples Utility. Peoples Utility's wholesale contracts require its wholesale customers to cooperate with Peoples Utility in responding to ITG traceback requests, as detailed above.

Peoples Utility is committed to fully complying with the Commission's robocall blocking requirements and confirms that it 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. Peoples Utility also blocks the traffic of all foreign providers and gateway providers that have not registered in the Robocall Mitigation Database.

Principals and Parents

Principal: Jason R Earl, President & CEO;

Parent:

- First United Equity Corporation