

ADAMS CATV, INC.

ROBOCALL MITIGATION PLAN

Adams CATV Inc. (“Adams”) is a broadband provider that offers interconnected VoIP services to its subscribers on a resold basis. Adams’ wholesale VoIP provider is Alianza, Inc. (“Alianza”), a provider of wholesale and retail VoIP and other communications services across the United States.

While Adams necessarily relies on the robocall mitigation policies, procedures, and safeguards instituted by Alianza, Adams 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 Alianza and other downstream providers.

Know-Your-Customer Policies

Subscriber Vetting: Adams vets the identity of its customers when approving an application and entering into a contract for telephone service. As part of this vetting process, Adams collects the customer’s legal name, address, contact information and federal taxpayer identification number (Social Security Number for residential customers and Employer Identification Number for commercial customers). Adams’ services are provided to fixed locations using its own network and services are typically installed on location by its personnel, so Adams knows the actual location of its customers. Adams will not provide service if a new customer’s identification cannot be verified.

Service Terms: Customers that use Adams’ telephone service for any unlawful purposes, including unlawful robocalls, are subject to suspension or termination of service.

Use of Call Analytics to Identify and Block Unlawful Traffic

As a reseller, Adams necessarily relies on its wholesale provider to monitor and detect patterns indicative of potential unlawful robocalls and to block such calls. While Alianza has not reported the use of any third-party call analytics systems in its robocall mitigation plan on file with the FCC, it has reported the implementation of a proprietary “fraud detection and mitigation process for high-volume network traffic to evaluate compliance with fraud detection indicators and fraud prevention best practices.” Alianza reports that its fraud detection system triggers would notify Adams “of potentially fraudulent activity” originating from Adams’ end-user customers.

If Adams receives a notification from Alianza of suspected unlawful robocall traffic originated by an Adams end user customer, Adams will conduct an investigation. To the extent a customer is found to have violated Adams’ service terms, Adams 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.

Knowledge of Upstream Providers

Adams' upstream provider, Alianza, is a well-known, reputable wholesale service provider that is registered in the FCC's Robocall Mitigation Database. Adams does not have knowledge of the upstream providers from which Alianza receives traffic but understands from Alianza's mitigation plan that Alianza's direct upstream connections are with Tier 1 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

Adams 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 Adams' customers, and will cooperate with Alianza on traceback requests.