

Cablelynx

ROBOCALL MITIGATION PLAN

WEHCO Video, Inc., and its subsidiaries Hope Community T.V.; Vicksburg Video, Inc.; Resort Television Cable Company, Inc.; Cam-Tel Company; Bald Knob Video, Inc.; Tahlequah Cable Television, Inc.; White County Video, Inc.; East Arkansas Video, Inc.; Pine Bluff Cable Television Company, Inc.; Kilgore Video, Inc.; Longview Cable Television Company, Inc.; and Prescott Video, Inc., each doing business as Cablelynx (collectively, “Cablelynx”) is a broadband provider that offers interconnected VoIP services to its subscribers on a resold basis. Cablelynx’s wholesale VoIP provider is Alianza, Inc. (“Alianza”), a provider of wholesale and retail VoIP and other communications services across the United States.

While Cablelynx necessarily relies on the robocall mitigation policies, procedures, and safeguards instituted by Alianza, Cablelynx 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: Cablelynx vets the identity of its customers when approving an application and entering into a contract for telephone service. As part of this vetting process, Cablelynx collects the customer’s legal name and address, physical location, contact information, and, for commercial customers, federal tax ID, jurisdiction of incorporation, and the nature of the business. Cablelynx’s services are provided to fixed locations using its own network and services are typically installed on location by its personnel, so Cablelynx knows the actual location of its customers. All of this information enables Cablelynx to validate the identity of potential customers prior to provisioning of service. If Cablelynx cannot validate the customer based on the initial information provided, Cablelynx will not provide service if a new customer’s identification cannot be verified.

Contractual Terms: Cablelynx’s Acceptable Use Policy (AUP) prohibits customers from using the service “to encourage, facilitate or engage in any illegal activities,” that if the company “has reason to suspect that a subscriber, or anyone using a subscriber’s account, is violating this Policy, then the account in question may be suspended pending an investigation,” and that “If, after an investigation, Cablelynx determines that an account has been used in violation of this Policy, Cablelynx may, in its discretion, terminate the user account.

Use of Call Analytics to Identify and Block Unlawful Traffic

As a reseller, Cablelynx 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 Cablelynx “of potentially fraudulent activity” originating from Cablelynx’s end-user customers.

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

Cablelynx’s upstream provider, Alianza, is a well-known, reputable wholesale service provider that is registered in the FCC’s Robocall Mitigation Database. Cablelynx does not have knowledge or insight into 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

Cablelynx will respond 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 Cablelynx customers, and will cooperate with Alianza on traceback requests.