

Robocall Mitigation Plan

Company Name: Three Lanterns, LLC **499 Filer ID:** 0032368599

Company Address 245 Morse Rd

Columbus, OH 43214

Company Contact: Seth Jackson **Contact Title:** Partner

Contact Phone: 614-515-2330 x 1006

Contact E-mail: sjackson@threelanterns.net

Type of Voice Customers: ☐ Residential ☒ Enterprise Business ☐ Wholesale

Voice Service Provided Via ☐ Own NXXs ☒ Leased DIDs

STIR/SHAKEN Certificate: ☐ Use own ☐ Use 3rd party provider's

Routing ☐ Via direct network connections
 ☒ Via 3rd party network connections
 ☒ Via DID provider's network connections

Before Service is Established for a New Customer

Customer Vetting Description	
Residential	We don't have any residential customers.
Enterprise Business	We have a personal relationship with all of our enterprise customers. Before new service is established, we get company details and owner information. We verify that the entity exists.
Wholesale (another company reselling your services)	We currently do not have any resellers.

Provisions regarding Traceback in Contracts

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Residential	We don't have any residential customers.
Enterprise Business	We currently do not have contracts with our enterprise customers.
Wholesale (another company reselling your services)	We currently do not have any resellers.

Participation in FCCs Enforcement Database	
FRNs associated with 499 Filer ID	0032368599

During Service

Plan for end users to have access to caller ID and blocking systems	
Residential	We don't have any residential customers.
Enterprise Business	Our platform allows any user to login, control the call flow and block calls from specific origin(s).
Wholesale (another company reselling your services)	We currently do not have any resellers.

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Monitoring Plan	
Residential	We don't have any residential customers.
Enterprise Business	Our system has settings in place to allow a limited amount of calls per customer at once. This alone will help mitigate a flood of calls. We also have daily limits on how much a client can spend per day. In addition, we have scripts in place to monitor when accounts try to reach and go over these limits
Wholesale (another company reselling your services)	We currently do not have any resellers.

Plan for Investigating Suspicious Activity	
Residential	We don't have any residential customers.
Enterprise Business	Should we get contacted by an outside company/agency or should any of our alerts get tripped our NOC will immediately look at the traffic profile to see if we can determine if there is any robo traffic. If there is any suspicion of such traffic we will reach out the customer and make sure there is a good explanation for such traffic. If there is not, services will be terminated.
Wholesale (another company reselling your services)	We currently do not have any resellers.

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After Service Has Been Used for Illegal Robocalling

Traceback Investigations	
Own traceback methods	Our network is completely IP. We log the source and destination IP of all calls along with customer details. Should we get a complaint we can easily see from which customer the traffic was initiated.
Traceback methods for dealing with law enforcement, the FCC, and/or ITG (Industry Traceback Group)	Should we get a request via email or fax from an authorized entity we plan on assisting in any investigation promptly.
Single Point of Contact for Tracebacks	Seth Jackson sjackson@threelanterns.net though all emails should go to support@threelanterns.net for a faster response. The contact phone is 614-515-2330 option 1. Every request should be sent in writing with a follow up phone call so the matter can be addressed with swiftly.

Communications with State Attorneys General	
Single Point of Contact	Seth Jackson 614-515-2330 x1006 sjackson@threelanterns.net