

Grand Rapids Connected, Inc.

Robocall Mitigation Compliance with TRACED Act

Grand Rapids Connected, Inc. (the “Company”) is committed to cooperating with the Federal Communications Commission (FCC), law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that it learns are using the Company’s service to originate or transit calls into the United States and its territories.

STIR/SHAKEN Implementation

The Company has fully implemented STIR/SHAKEN call authentication for all applicable IP-based outbound voice traffic.

The Company holds a valid SPC token issued by the STI-PA under its assigned Operating Company Number (OCN) and applies STIR/SHAKEN authentication signatures to outbound calls via its Session Border Controller (SBC) infrastructure prior to transmitting traffic to upstream carriers.

Attestation levels (A, B, or C) are assigned based on the Company’s verified relationship with the customer and validation of the customer’s right to use the originating telephone number, in accordance with FCC regulations and industry governance standards.

Traceback Cooperation

The Company commits to fully responding within 24 hours to all traceback requests from the Industry Traceback Group (ITG), the TPTG, the FCC, and law enforcement.

The Company shall cooperate with these groups to investigate and stop any illegal robocallers from using the Company’s service to carry or process illegal calls.

When notified in writing by the FCC’s Enforcement Bureau of identified illegal traffic, the Company shall block and report such identified illegal traffic, and any substantially similar traffic, on an ongoing basis unless the Company’s investigation reasonably determines that the traffic is not illegal.

If the Company determines that the identified traffic is not illegal, the Company shall provide the Enforcement Bureau with a written explanation describing why the Company reasonably concluded that the traffic is not illegal and what investigative steps were taken to reach that conclusion.

Robocall Mitigation Program

The Company utilizes a combination of internal tools and third-party solutions to prevent the origination and transmission of illegal robocalls.

This includes:

- Checking for Do Not Originate (DNO) numbers.
- Detecting invalid phone number formats, invalid area codes, and unassigned number blocks.
- Utilizing data analytics to detect and investigate irregular or unexpected calling patterns.
- Comparing originating number usage against customer profiles.

The Company uses data systems for analytics and reviews to identify illegal robocalling in addition to maintaining a Know Your Customer (KYC) requirement to access the Company's networks.

The process includes:

- Monitoring the network to identify suspicious traffic patterns.
- Limiting customers' capacity via calls-per-second (CPS) and/or concurrent session limits.
- Regularly reviewing call patterns for possible abusive traffic.
- Verifying all new customers through a combination of electronic and manual verification systems, credit reviews, references from trusted industry members, and prior business history when available.
- Limiting the capabilities of new accounts until appropriate verification processes are complete.

The Company reserves the right to downgrade STIR/SHAKEN attestation levels, restrict outbound calling privileges, suspend service, or terminate customer relationships where number authorization cannot be verified, where traffic patterns raise compliance concerns, or where required to protect the integrity of the Company's network and upstream carrier relationships.

Continued

Upstream Interconnection

Grand Rapids Connected, Inc. interconnects with two upstream carriers for the exchange of IP-based voice traffic:

1. PayG LLC dba SkySwitch
Arborcrest 1, 751 Arbor Way
Suite 150
Blue Bell, PA 19422
Phone: 747.777.8100
Email: support@skyswitch.com
2. Bandwidth.com CLEC, LLC
900 Main Campus Drive
Raleigh, NC 27606
Phone: 919.704.3069
Email: voicesecurity@bandwidth.com

Traffic Blocking Authority

The Company reserves the right to refuse traffic from any party at any time where robocalling, spoofing, use of invalid originating numbers, or unauthorized use of telephone numbers has occurred or is reasonably suspected.

The Company is able to block originating numbers, terminating numbers, trunks, or customer accounts, including termination of the customer relationship, to prevent illegal robocalling, invalid number origination, or spoofed traffic from transiting the Company's network.