

Net Ops Communications LLC Robocall Mitigation Plan

Net Ops Communications LLC (“Net Ops” or “Company”) submits this Robocall Mitigation Plan pursuant to Section 64.6305 of the Federal Communications Commission’s (“Commission” or “FCC”) rules. While NetOps necessarily relies on the robocall mitigation policies, procedures, and safeguards instituted by its wholesale VoIP and STIR/SHAKEN provider Atheral, LLC (“Atheral”), the Company has also adopted this robocall mitigation plan to define the following specific reasonable steps it takes to limit the potential for the origination of unlawful robocalls by its customers.

STIR/SHAKEN Implementation

Atheral has certified that it has complete STIR/SHAKEN implementation within its network. Atheral signs calls on Net Ops’ behalf.

Know-Your-Customer Policies

Subscriber Vetting: Net Ops vets its customers by confirming the identity of new or renewing residential and business customers through the collection, as applicable, of SSN, date of birth, contact person for the business, physical address, state and/or country of incorporation, and federal tax ID.

Terms of Service: The Net Ops Acceptable Use Policy (“AUP”) provides that service may only be used for lawful purposes. Pursuant to the AUP, customers are prohibited from transmitting unlawful or otherwise objectionable information; and customers may not engage in conduct that would constitute a criminal offense, infringe on third party rights, give rise to civil liability, or violate any local, or international statute, rule, regulation, or treaty. Consistent with the policy, Net Ops may block calls, warn the caller to stop, or suspend and/or terminate their service.

Cooperation with the Traceback Group, Law Enforcement and Government Agencies

Net Ops cooperates with the Commission, law enforcement, and the Industry Traceback Group (“ITG”) in investigating and stopping any robocallers that use our service to originate unlawful robocalls, including by responding fully within 24 hours to all traceback requests from ITG and cooperating with Atheral on traceback requests it receives.

Use of Call Analytics to Identify and Block Unlawful Traffic

Atheral uses TransNexus’s Clear IP call analytics solution to monitor Company’s originating voice traffic in real-time to prevent the origination of illegal robocalls. The software provides detailed reporting, identifying suspected illegal robocalls and alerts Atheral if the Company’s end users originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database, or has a poor reputation. Company will investigate report or alert received from Atheral of suspected unlawful robocall traffic. If it is determined that the caller was attempting to originate unlawful robocalls, we will take appropriate action consistent with our AUP, which may include suspension or termination of service.

Know-Your-Upstream-Provider

Net Ops necessarily relies on the know-your-upstream provider processes adopted by Atheral.