

OZARK FIBER, LLC ROBOCALL MITIGATION PLAN

This document describes Ozark Fiber's robocall mitigation plan and commitments consistent with 47 CFR § 64.6305(a).

Alianza, Inc. (Alianza – RMD0006320) is Ozark Fiber's sole underlying voice services provider. Ozark Fiber does not own or operate any voice switching equipment, lacks control over the network infrastructure necessary to implement STIR/SHAKEN, and is therefore exempt from implementation obligations.

Accordingly, Ozark Fiber relies on the procedures, policies, and safeguards implemented by Alianza to ensure that Ozark Fiber's residential and business customers are sufficiently protected against robocall and spoofing activities. On behalf of Ozark Fiber, Alianza authenticates voice traffic using STIR/SHAKEN.

1. OZARK FIBER, LLC's CORPORATE INFORMATION

Ozark Fiber, LLC is a Missouri corporation. Its primary address is provided within the Robocall Mitigation Database.

Ozark Fiber certifies it has not been prohibited from filing in the Robocall Mitigation Database and has not been subject to any Commission, law enforcement, or regulatory agency action or investigation arising from suspected unlawful robocalling or spoofing.

In accordance with 47 CFR § 64.6305(e), Ozark Fiber has designated a point of contact to receive notice of any illegal robocall traffic or other robocall mitigation-related issues. That person's name, title, address, phone number, and email address are available within the Robocall Mitigation Database.

2. KNOW YOUR CUSTOMER and SUBSCRIBER VETTING

Ozark Fiber takes reasonable steps to verify the identity of its voice service subscribers and to prevent the origination of illegal robocalls on its network.

- **Customer Identity Verification:**
During service activation, Ozark Fiber collects and verifies basic subscriber information, including name, service address, and contact details. Business customers are also required to provide the business name and a primary point of contact.
- **Prohibited Use:**
All subscribers are bound by Ozark Fiber's Terms of Service, which explicitly prohibit the use of voice services for illegal robocalls or other abusive calling practices such as autodialing, spoofing, or telemarketing without consent.
- **Monitoring and Enforcement:**
All outbound call traffic is monitored for patterns consistent with illegal robocall activity. When such activity is detected, Ozark Fiber may investigate and, if appropriate, suspend or terminate service.

Ozark Fiber's robocall mitigation practices are designed to comply with the requirements of 47 C.F.R. § 64.1200(n)(4) and are reviewed and updated as needed to address emerging risks.

3. KNOW YOUR UPSTREAM PROVIDER PROCEDURES

Alianza has existing agreements with Tier-I carrier service providers from which it facilitates the provision of carrier services to its service provider customers. Alianza has confirmed that each of those carriers are listed in the RMD. Alianza also enables its customers to contract directly with carrier service providers to enable those customers' use of Alianza's Cloud Communications Platform. In each case, Alianza has provided detailed onboarding and fraud detection guidance to require and enable its customers to comply with their obligations to prevent and mitigate illegal robocalling.

4. FRAUD DETECTION AND MITIGATION

Alianza has implemented a proprietary fraud detection and mitigation process through which it analyzes high-volume network traffic to evaluate compliance with a variety of fraud detection indicators and fraud prevention best practices. Through this fraud detection and mitigation process, Alianza then notifies individual customers of potentially fraudulent activity occurring in any of that customer's subscriber accounts. Detailed information about this fraud detection and mitigation process is provided to each customer through Alianza's knowledge base and support resources. Alianza may take remedial action against any subscriber's account to prevent or remediate robocalling or other fraudulent activity. If Alianza takes any such action, its fraud detection system triggers notification to the customer of that action and any remedial steps that may be taken to restore service.

5. ENFORCEMENT

Ozark Fiber and Alianza respond within 24 hours to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group. Ozark Fiber and Alianza also cooperate with those entities and with its carrier partners to investigate and prevent any illegal robocallers from using Alianza's services to originate calls. Alianza employees engage directly with Alianza's customers to suspend or disable subscriber accounts identified as originating unlawful robocalls through Alianza's network.