

ROBOCALL MITIGATION PLAN FOR Cumberland Connect, LLC

Pursuant to section 64.6305 of the Federal Communications Commission's rule, Cumberland Connect, LLC ("Connect") submits this document addressing its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls.

Connect has implemented the following Robocall Mitigation Plan to detect and prevent unlawful robocalls from originating on its network. All calls that originate on Cumberland Connect's network are subject to this robocall mitigation program. These policies and procedures will remain in effect until notice is provided to the FCC regarding a significant change.

Connect has not been prohibited from filing in the Robocall Mitigation Database by the Commission. Connect has not been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

I. OVERVIEW

Alianza, Inc. ("Alianza") is Cumberland Connect's underlying voice services provider. Alianza has certified in the FCC's Robocall Mitigation Database that it has implemented STIR/SHAKEN. Alianza is also listed as an authorized provider on the Secure Telephone Identify Policy Administrator list. Accordingly, as a voice service provider, Connect relies on procedures, policies, and safeguards implemented by Alianza to ensure that Connect's residential and business customers are sufficiently protected against robocalls and spoof activities. Cumberland Connect is not a foreign voice service provider.

II. TRACEBACK REQUESTS

Cumberland Connect commits to respond within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

III. STIR/SHAKEN

On behalf of Cumberland Connect, Alianza certifies that all voice traffic originating on its network is authenticated in compliance with applicable standards under section 64.6301 of the Federal Communications Commission's rule. Alianza has certified in the FCC's Robocall Mitigation Database that it has implemented STIR/SHAKEN. Alianza is also listed as an authorized provider on the Secure Telephone Identify Policy Administrator list.

IV. Know-Your-Upstream Providers Procedures

As Cumberland Connect's underlying voice provider, Alianza has existing agreements with Tier-1 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 is listed in the Robocall Mitigation Database. 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.

V. Know-Your-Customer Procedures

As a subsidiary of Cumberland Electric Membership Corporation (CEMC) an electric cooperative, Cumberland Connect's subscribers also use our electric utility services. All new and renewing Connect subscribers must have a physical location in our CEMC's service area. Connect will confirm the identity of subscribers and whether it is a business. If a subscriber is a business, Connect will verify the subscriber through collecting information such as physical location, contact person(s), physical location, State incorporation, Federal Tax ID, and/or nature of the business.

VI. ROBOCALL MITIGATION PRACTICES

Alianza uses call analytics provided by Bandwidth to monitor Connect outbound voice traffic in real time to prevent the origination of illegal robocalls. The software identifies calling patterns that would indicate robocall activity, such as an unusual number of calls from a telephone number and/or an unusual number of short duration or incomplete calls. The software provides detailed reporting identifying suspected illegal robocalls. The software also provides alerts where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. Alianza determines if the caller was attempting to create unlawful robocalls. If it is determined that the caller was attempting to originate unlawful robocalls, then Connect either warns them to stop or terminates their service, as appropriate pursuant to its Acceptable Use Policy. Alianza has partnered with NoMoRobo, Inc to make available call blocking solutions that block 95% of unwanted calls for residential subscribers.

Robocall Mitigation Database Eligibility

Cumberland Connect has not been prohibited from filing in the Robocall Mitigation Database by the Federal Communications Commission.

Contact Information for Robocall Mitigation Plan Representative

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