



Robocall Mitigation Plan

This robocall mitigation plan is for Elevation Broadband, LLC (d/b/a Natel Broadband, with headquarters at 907 W Burlington Ave # 1, Fairfield, IA 52556).

We perform the following roles in the call chain:

- provider without a STIR/SHAKEN obligation

Elevation Broadband, LLC has not been prohibited from filing a certification in the Robocall Mitigation Database.

Elevation Broadband, LLC does not have a history of enforcement actions for illegal robocalls, TCPA or TSR violations, or related state law violations.

Elevation Broadband, LLC uses the following affirmative, effective measures to prevent the origination or transit of illegal robocalls.

Know Your Customer

Elevation Broadband, LLC (d/b/a Natel Broadband) follows the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group.

(<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

Know Your Upstream Provider

We have a vetting and review process for upstream providers, that is, providers that send us voice traffic that we terminate or transit to other providers.

We confirm that the upstream provider has a certification in the Robocall Mitigation Database. We will not accept voice traffic from an unregistered provider.

We require that upstream providers have a reasonable robocall mitigation plan, including a vetting process for their customers and upstream providers, and use call analytics to identify suspicious traffic.

We establish an understanding of the upstream provider's role in the call path for the traffic they will send to us, for example, whether they are acting as an originating voice service provider, a foreign intermediate provider, or a U.S.-based intermediate provider. We use this information to understand whether we will be obligated to authenticate unsigned traffic that we receive from them.

Our contractual provisions with upstream providers prohibit them from sending us illegal robocalls. If we find that an upstream provider is sending us suspicious robocalls, we warn them to stop. If such traffic continues, then we terminate their service.

Traceback

Elevation Broadband,LLC (d/b/a Natel Broadband) will respond to all traceback requests from the Commission, law enforcement, and the registered traceback consortium, and cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate call

Robocall Mitigation Program

Elevation Broadband,LLC (d/b/a Natel Broadband) is implementing a robocall mitigation program described below, requiring all voice traffic that originates on our network be subject to these stringent standards. All originating TN's are vetted at time of service installation and associated with a domestic physical address and responsible party. We use software provided by our billing vendor NISC to identify abnormal calling patterns identified within call detail records. Should abnormal calling patterns be detected, Elevation Broadband,LLC personnel will contact the responsible party for remediation.

STIR/SHAKEN

Elevation Broadband,LLC (d/b/a Natel Broadband) is currently a reseller of Aureon's Agent Program. With this program all originating TN's are provided by Aureon and are applied Aureon's SHAKEN certificate. Additional originating TN'ss not provided by Aureon are being applying a SHAKEN certificate by upstream voice providers.