

Pioneer Long Distance, Inc.

STIR/SHAKEN Implementation, Certification, and Robocall Mitigation Plan

Pioneer Long Distance, Inc. (Pioneer or Company) submits this document pursuant to section 64.6305(d) of the Federal Communications Commission's (Commission's or FCC's) rules.

STIR/SHAKEN Implementation

Pioneer is a voice service provider with a STIR/SHAKEN implementation obligation serving end-users. Pioneer has implemented the STIR/SHAKEN authentication framework on a portion of its network. For the non-IP portions of its network, the Company is subject to a continuing extension as set forth in section 64.6304(d) of the Commission's rules, which is relevant to those "portions of a voice service provider's network that rely on technology that cannot initiate, maintain, and terminate SIP calls." Pioneer is a member of NTCA, which is actively participating in industry efforts to develop a non-IP solution to protect against illegal robocalls.

Enforcement

All calls that originate on Company's network are subject to the attached Robocall Mitigation Plan.

Neither Pioneer nor any entity for which Company shares common ownership, management, directors, or control have ever 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 transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program.

Pioneer has not been prohibited by the Commission from filing in the Robocall Mitigation Database.

Pioneer commits to cooperate with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any robocallers that use our service to originate unlawful robocalls. Pioneer will respond fully, within 24 hours, to all traceback requests from the Commission, law enforcement, and the industry traceback consortium.

Robocall Mitigation Plan

Pioneer has taken specific reasonable steps to avoid carrying or processing illegal robocall traffic.

Pioneer utilizes TransUnion/Neustar as our third-party analytics vendor. The TransUnion/Neustar software monitors our outbound voice traffic in real time to prevent the origination of illegal robocalls. The software helps identify illegal calls originating in the network and stop/block them from reaching our customers. The software provides detailed reporting identifying suspected illegal robocalls and alerts us if we 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. Robocall Mitigation and STIR/SHAKEN call authentication helps Pioneer identify unauthorized and suspicious use of phone numbers and detect trends and anomalies in calling patterns. Pioneer also receives daily reports from pertinent network equipment of excessive calls, repeated calls, outgoing international calls, and incoming international calls.

If an anomaly is identified by Pioneer, the TransUnion/Neustar software, or a trusted upstream provider, Pioneer will investigate, including contacting the relevant caller and taking appropriate actions consistent with our Terms and Conditions and Acceptable Use Policy (AUP).

Our Terms and Conditions, which must be acknowledged by all customers prior to service initiation, include a provision requiring customers to comply with all applicable laws in connection with the customer's use of our services. All customers must also agree to abide by AUP. If a customer is found to have violated our Terms and Conditions or AUP, we will take action commensurate with the severity of the customer's offense, including, but not limited to, providing the customer with a warning and suspending or terminating the customer's service.

Pioneer undertakes reasonable, good faith efforts to vet the identity of our subscribers when approving new or renewal applications for service, provisioning network connectivity, and entering into contract agreements. We will confirm the identity of new or renewing residential and business customers by collecting identifying information including, as applicable, SSN, date of birth, contact person for the business, physical address, state and/or country of incorporation, and federal tax ID. New customers requesting an excessive number of call paths will be screened for legitimate usage needs. All residential and business customers are only able to place calls originating from their own phone number. Caller ID and call records are reviewed when service is installed to verify legitimate caller ID information.

Know Your Upstream Provider

The Company has a very small number of upstream providers. Pioneer knows all carriers from which it receives traffic. Pioneer has confirmed that all connected providers are listed

in the Robocall Mitigation Database. Pioneer will share call authentication data with connected service providers.

Traceback

Pioneer will respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and will cooperate with such entities in investigating and stopping any robocallers that use our network to originate robocalls.