

This Robocall Mitigation Plan describes the specific reasonable steps that WTC Communications, Inc. (“WTC”) has taken to avoid the origination, carrying, or processing of illegal robocall traffic. WTC plays two roles in the call chain. It is (1) a facilities-based voice service provider, and (2) a non-facilities based reseller of long distance service (non-gateway intermediate provider). In WTC’s role as long distance reseller, the Company’s wholesale network provider is [Sinch](#).

Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Robocalls

WTC has a “know-your-customer” policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. Specifically, for new and renewing business customers, WTC collects information such as the customer’s physical business location, contact person(s), state or country of incorporation, federal tax ID, and the general nature of their business.

Although WTC’s customers generally do not generate a high volume of calls, were WTC to receive a request for high-volume origination services, it would exercise caution and extensively investigate such customers before granting access to the services.

“Know-Your-Upstream Provider” Procedures

Most of the connections that WTC has with upstream providers have been in place for many years, and we know these companies very well. However, WTC exercises due diligence before accepting traffic from any new upstream provider as we seek to ensure that such providers are not using WTC to carry or process a high volume of illegal traffic. Specifically, WTC collects information such as the upstream provider’s physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of their business.

In its role as a non-gateway intermediate provider, WTC only offers long distance service to the local voice service customers of WTC, Wamego Telephone Company, Inc. (its parent company), and WTC Technologies, Inc. (its affiliate). Therefore, in its role as a long-distance service provider, WTC knows very well the only upstream providers from which it receives traffic.

Use of Call Analytics Systems

WTC analyzes traffic for patterns indicative of fraudulent calls – e.g., short duration calls with low completion rates. Wamego uses [MACC](#) for customer billing and processing of CABS. MACC currently trends call records sent to WTC in order to quickly identify call volumes falling outside of predetermined company-specific ranges. This volume range is applied per NPA / NXX on originating toll, originating access, and terminating access.

If WTC detects a pattern consistent with illegal robocalls, or otherwise has reason to suspect illegal robocalling or illegal spoofing is occurring over its network, the Company will seek to

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identify the party that is using its network to originate, route, or terminate these calls and take appropriate action. Taking appropriate action may include, but is not limited to, initiating a traceback investigation, verifying that the originating customer owns or is authorized to use the Caller ID number, determining whether the Caller ID name sent to a receiving party matches the customer's corporate name, trademark, or d/b/a name, terminating or suspending the party's ability to originate, route, or terminate calls on WTC's network, or notifying law enforcement authorities.

In its role as a non-facilities based reseller of long distance service, WTC relies, in part, on the call analytics systems of its wholesale provider, Sinch.

Commitment to Respond to Traceback Requests

WTC commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its services to originate, carry, or process illegal robocalls.