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## Sierra Nevada Communications Robocall Mitigation Plan

Sierra Nevada Communications is a small rural cable and wireless broadband service provider and VoIP Reseller operating in California and offers facilities-based VoIP services primarily to residential customers.

Sierra Nevada Communications has implemented the following Robocall Mitigation Program for its VoIP network and has implemented reasonable steps to avoid originating illegal robocall traffic:

- o Know Your Customer: Prospective new voice service customers must speak with a Sierra Nevada Communications customer service agent to order voice services; there is no mechanism allowing voice service initiation without that human touch. Sierra Nevada Communications obtains the name and physical location of all subscribers prior to initiating service. Additionally, Sierra Nevada Communications vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new services or making changes to existing services.
- o Sierra Nevada Communications' written Terms of Service prohibit any subscriber from inappropriate usage of Sierra Nevada Communications services, including but not limited to the transmission of any data that violates any federal, state, or local regulation. Sierra Nevada Communications reserves the right to terminate service for failure to comply with our Terms of Service.
- o Sierra Nevada Communications connects to the Public Switched Telephone Network through third-party SIP origination/termination service providers. These parties are compliant with STIR/SHAKEN and only accept network traffic from carriers that are in the Robocall Mitigation Database.
- o Sierra Nevada Communications' VoIP subscribers can only use telephone numbers obtained from Sierra Nevada Communications to originate and terminate telephone calls.

Sierra Nevada Communications shall respond fully and in a timely manner to all traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium, and will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.