

WeConnect Communications, Inc.
Robocall Mitigation Plan

STIR SHAKEN

WeConnect Communications, Inc (WeConnect) is a family owned, U.S. based small/rural provider with fewer than 100,000 voice subscriber lines. However, WeConnect utilizes a third party wholesale provider, Toly Digital Networks (Toly), as the source for its voice services, and as such, is fully SHAKEN/STIR compliant. Toly is completely STIR/SHAKEN compliant per their Robocall Mitigation Plan, as posted in the Robocall Mitigation Database February 20, 2026. Toly, as the voice switch service provider to which the end users connect, partners with TransNexus as the STI-Certificate Authority in providing STIR/SHAKEN compliant service.

All calls that originate on WeConnect's network are STIR/SHAKEN compliant through our participation in Toly's STIR/SHAKEN infrastructure, and utilize Toly's network for all outbound calls.

WeConnect has implemented the following robocall mitigation program to detect and prevent unlawful robocalls from originating on its network. All calls that originate on WeConnect's network are subject to the described robocall mitigation program.

Robocall Mitigation Plan

-Analytics

WeConnect relies upon their third-party provider's (Toly's) analytics for identification and prevention of the potential origination of robocalls, as calls for WeConnect originate from Toly's switch infrastructure. Toly signs the originated outbound calls for WeConnect utilizing the certificate of WeConnect's affiliate, Fulton Telephone Company. Toly uses software provided by TransNexus to monitor outbound voice traffic to identify and prevent the potential origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts them if their switch originates 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. Their Robocall Mitigation Plan indicates they immediately investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If they determine that the caller was attempting to originate unlawful robocalls, they either warn them to stop or terminate their service as appropriate. As such, WeConnect maintains consistent and open communication with Toly as part of our Robocall Mitigation strategy.

WeConnect is committed to halting any illegal robocall activity originating on its network. Illegal robocalling activities are prohibited in the company's service terms, and the company will efficiently investigate and act on reported robocalling activity.

-Investigation

Suspect calls and customer complaints are investigated promptly. Investigations may include, but are not limited to call history, call records, and direct inquiry, depending upon the particular circumstances of a suspected incident. Investigation will be initiated within one business day for any customer complaints regarding suspected robocall activity.

-Enforcement

Any WeConnect customer that is suspected of robocalling will have their voice services suspended immediately pending further investigation. If it is determined a WeConnect customer is originating prohibited unlawful robocalls on our network, WeConnect will either warn the customer to cease prohibited activities or terminate their service as allowed per WeConnect policy. Discovery of customer-originated fraudulent robocall activity will result in reporting of such activity to the appropriate authorities, dependent upon circumstance (for example, public service commission, FCC, etc).

-Know Your Customer

WeConnect has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. WeConnect thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services.

-Upstream Provider Knowledge

WeConnect knows all the carriers from which it receives traffic, has confirmed that all its connected carriers are listed in the Robocall Mitigation Database, has reviewed the connected carriers' Robocall Mitigation Programs to learn how those carriers monitor their originating traffic and mitigate illegal robocalls. WeConnect maintains open communications channels with its upstream providers to ensure an efficient means of reporting and mitigating irregular activity, including, but not limited to, fraudulent robocalling activity. WeConnect incorporates traceback and prohibited traffic language in all new contractual agreements with carriers. WeConnect does not directly receive traffic from any foreign originating or intermediate provider. No provider is using WeConnect's network to carry or process a high volume of illegal traffic.

-Role In Call Chain

WeConnect's role in the call chain is as a voice service provider with a STIR/SHAKEN obligation serving end users. WeConnect utilizes a third party wholesale provider, Toly Digital Networks (Toly), as the source for its voice services. WeConnect does not operate those switching facilities.

Traceback

WeConnect is committed to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to originate calls.

WeConnect is committed to complying with the FCC's TRACED Act (FCC-20-42A1) and related legally specified traceback requirements, and requires all customers and users of WeConnect's Voice Service to comply with these laws. Accordingly, as stated in its Terms Of

Service, customers may not use WeConnect equipment, network, facilities, or voice or broadband service in any way to engage in or otherwise permit illegal robocalling or spoofing activities.

Robocall Mitigation Database Eligibility

To our knowledge, WeConnect has NOT been barred from the RMD due to any law enforcement or Commission action as of the time of posting of this document, and is NOT subject to any formal Commission, law enforcement, or other regulatory agency action or investigation due to suspected unlawful robocalling.