

ROBOCALL MITIGATION PLAN

Status of Caller ID Authentication

American Broadband Holding Company and its subsidiaries set forth on Exhibit A, in each case doing business as Fastwyre Broadband (collectively, “Fastwyre Broadband” or “Company”), function as originating service providers and/or non-gateway intermediate providers and operate both IP and non-IP networks. While Fastwyre Broadband has implemented STIR/SHAKEN on the IP portions of its network in accordance with § 64.6303(b), the Company has not deployed STIR/SHAKEN on the non-IP portions of its network.

Fastwyre Broadband is subject to a continuing extension of the implementation date for the portions of its network that rely on technology that cannot initiate, maintain, and terminate SIP calls pursuant to § 64.6304(d) of the Commission’s Rules. As required to meet the criteria for that extension, the Company participates in the Non-IP Call Authentication Task Force established by ATIS which is addressing challenges with call authentication on TDM networks.¹

All calls originated on the Fastwyre Broadband network or carried on the Fastwyre Broadband network are subject to the robocall mitigation measures outlined below.

Know Your Customer

The Company has a “know your customer policy” to assist in preventing new or renewing customers from utilizing the Company’s voice services to originate illegal robocall traffic. The Company takes measures to validate upstream providers and potential business customers prior to providing service. These measures include collecting pertinent upstream provider/business information including physical location/address, contact name(s), state or country of incorporation, federal tax ID, and the general nature of their business. The Company may consider implementing additional measures if its current practices are inadequate to prevent the origination of illegal robocalls on its network or if circumstances warrant.

Traceback

The Company commits to respond to all traceback requests from the Commission, law enforcement agencies, and the Industry Traceback Group (“ITG”) within 24 hours or other shorter timeframes required by law. We will also fully cooperate with law enforcement, regulatory, and other approved entities to investigate and take appropriate measures to stop robocallers that may attempt to utilize our networks or services to originate, carry, or process illegal robocalls.

Robocall Mitigation Program

The steps taken by the Company that are expected to appropriately detect and significantly reduce the origination of illegal robocalls are detailed below. The Company will periodically evaluate the risks it faces, the effectiveness of its policies and procedures, and its capabilities to support the measures described.

The Company performs robocall mitigation in its network by using a combination of subscriber

¹ Fastwyre Broadband is a member of industry associations that participate in the ATIS Task Force. Fastwyre Broadband previously had a representative that participated directly in the ATIS Task Force but now participates through industry associations of which it is a member.

policies and operational processes, including the following:

- **Contractual Provisions**

- ***Limitations on Use of Service:*** The Company has provisions regarding how the service is to be used, limiting use of the service to lawful purposes, and prohibiting use of the service for illegal purposes. In addition, the Company limits use of the service to the customer, its employees and representatives (for business service); or the customer, their family and persons residing in the customer's household (for residential service); except as otherwise specified.
- ***Cancellation for Cause:*** The Company may either suspend or terminate a customer's service if the service is being used for unlawful purposes or to make nuisance or fraudulent calls.
- ***Acceptable Use Policy:*** The Company's acceptable use policy also reinforces these provisions, prohibiting customers from using the Company's service for unlawful purposes and enabling the Company to suspend or terminate customers in response.

- **Operational Procedures**

- ***Traffic Monitoring:*** The Company has implemented a variety of operational processes to analyze and monitor network traffic. For certain subsidiaries, call detail records are pulled from our Metaswitch and Redcom switches daily. The information is transferred to an Equinix program. The Equinix program analyzes these records searching for the pattern of a robocall, such as multiple short duration calls to various numbers within a day. If a pattern is detected, an exception report is generated that populates any originating number.

This report is reviewed by the Company to verify suspicious calling patterns and initiate customer outreach where needed. The Company reviews the customer account associated with the originating number, confirms the identity of any commercial customers, and determines if calls were malicious robocalls that should be blocked. If it is determined that a customer is making robocalls, the Company will immediately notify them, they will be given an opportunity to explain the calls, and if they are unable to do so, the Company will install the appropriate call blocking. If robocalls continue to be generated by the customer thereafter, the Company will disconnect the customer's service and notify the customer accordingly.

- ***Analytics:*** The Company has installed the TNS Call Guardian analytics solution for certain subsidiaries to monitor traffic on their networks and identify potentially unlawful call origination activity. These capabilities will be available for certain subsidiaries once inbound calling via SIP trunking is enabled. When that occurs, data analytics will be utilized to provide a reputation score to the inbound calling party. Call Guardian will then apply the Universal Call Blocking (“UCB”) and Advanced Call Treatment (“ACT”) functions to either block calls or redirect them to voicemail.

If there is a reasonable basis to believe that a customer is originating illegal robocalls, the Company will require the customer to remedy the problem and, if effective action is not promptly taken, the Company may suspend and/or terminate service to the customer.

Principals, Affiliates, Subsidiaries, and Parent Companies

Fastwyre Broadband is indirectly controlled by a private equity investment management firm Madison Dearborn Partners, LLC (“MDP”). The Commission approved the acquisition of Fastwyre Broadband by MDP via public notices issued on February 4 and 16, 2021². Additional details are included below in Exhibit B.

² See Public Notice, Notice of Domestic Section 214 Authorization Granted, WC Docket No. 20-438, DA 21-173 (rel. Feb. 16, 2021); Public Notice, International Authorizations Granted, Report No. TEL-02073, DA No. 21-86 (rel. Feb. 4, 2021).

Exhibit A - Fastwyre Broadband Entities

	<u>OCN</u>	<u>FRN</u>
American Broadband Holding Company d/b/a Fastwyre Broadband		0034159772
Moundville Telephone Company, Inc. d/b/a Fastwyre Broadband	0307	0001753938
MTC Long Distance, Inc. d/b/a Fastwyre Broadband		0011440872
Interior Telephone Company d/b/a Fastwyre Broadband	3011	0003739521
Mukluk Telephone Company, Inc. d/b/a Fastwyre Broadband	3016	0003739554
TelAlaska Cellular, Inc. d/b/a Fastwyre Broadband	588F	0003740768
TelAlaska Long Distance, Inc. d/b/a Fastwyre Broadband		0003739562
Cameron Telephone Company, L.L.C. d/b/a Fastwyre Broadband	0425	0001715937
Cameron Communications, L.L.C. d/b/a Fastwyre Broadband		0003731155
Elizabeth Telephone Company, L.L.C. d/b/a Fastwyre Broadband	0430	0003731114
LBH, LLC d/b/a Fastwyre Broadband	645C	0011245867
Holway Telephone Company d/b/a Fastwyre Broadband	1929	0004746863
Holway Long Distance Company d/b/a Fastwyre Broadband		0005726732
K.L.M. Telephone Company d/b/a Fastwyre Broadband	1900	0003772274
KLM Long Distance Company d/b/a Fastwyre Broadband		0005729538
N. W. Communications Co. d/b/a Fastwyre Broadband		0003772290
Arlington Telephone Company d/b/a Fastwyre Broadband	1517	0003746542
The Blair Telephone Company d/b/a Fastwyre Broadband	1524	0003738275
Eastern Nebraska Telephone Company d/b/a Fastwyre Broadband	1542	0003738283
Rock County Telephone Company d/b/a Fastwyre Broadband	1586	0003738309
HunTel Cablevision, Inc. d/b/a Fastwyre Broadband		0007129216

Exhibit B - Principals, Affiliates, Subsidiaries, and Parent Companies

Parent Company: American Broadband Holding Company dba Fastwyre Broadband

Address: All entities disclosed herein have a headquarters of 13200 Metcalf, Suite 400, Overland Park, KS 66213

Executive Officers for all entities listed below: Christopher Eldredge (CEO)
John Walter (EVP – General Counsel and Secretary)
Kim Czak (SVP of Operations)
Ryan McDonald (SVP of Finance)

Each of the following entities are subsidiaries of American Broadband Holding Company, a Delaware corporation:

<u>Entity Name</u>	<u>Description of Principal Business</u>
Elizabeth Telephone Company, L.L.C., a Louisiana limited liability company	ILEC in LA
Cameron Telephone Company, L.L.C., a Louisiana limited liability company	ILEC in LA and TX
Cameron Communications, L.L.C., a Louisiana limited liability company	IXC and cable provider in LA
LBH, L.L.C., a Louisiana limited liability company	CLEC and cable provider in LA and TX
The Blair Telephone Company, a Nebraska corporation	ILEC in NE
Rock County Telephone Company, a Nebraska corporation	ILEC in NE
Arlington Telephone Company, a Nebraska corporation	ILEC in NE
Eastern Nebraska Telephone Company, a Nebraska corporation	ILEC in NE
HunTel Cablevision Inc., a Nebraska corporation	CLEC, long-distance and cable provider in NE
Holway Telephone Company, a Missouri corporation	ILEC in MO
K.L.M. Telephone Company, a Missouri corporation	ILEC in MO
Holway Long Distance Company, a Missouri corporation	Long distance provider in MO
KLM Long Distance Company, a Missouri corporation	Long distance provider in MO
N.W. Communications Co., a Missouri corporation	CLEC, long distance and cable provider in MO
Moundville Telephone Company, Inc., an Alabama corporation	ILEC in AL
MTC Long Distance Company, Inc., an Alabama corporation	CLEC and long-distance provider in AL
TelAlaska Cellular, Inc., an Alaska corporation	Wireless provider in AK
Interior Telephone Company, an Alaska corporation	ILEC in AK
Mukluk Telephone Company, Inc., an Alaska corporation	ILEC in AK
TelAlaska Long Distance, Inc., an Alaska corporation	CLEC in AK