

LYONS COMMUNICATIONS

ROBOCALL MITIGATION PLAN

Z3N, LLC d/b/a Lyons Communications (“Lyons”) is a broadband provider that offers interconnected VoIP services to its subscribers on a resold basis.

Know-Your-Customer Policies

Subscriber Vetting: Lyons vets the identity of its customers when approving an application and entering into a contract for telephone service. As part of this vetting process, Lyons collects the customer’s legal name and address, physical location, contact information, and, for commercial customers, federal tax ID, jurisdiction of incorporation, and the nature of the business, and Lyons may require additional information to validate the customer. In some instances, Lyons also utilizes third-party agencies for additional information regarding the credit and/or fraud risk associated with a potential customer. Lyons’ services are provided to fixed locations using its own network and services are typically installed on location by its personnel, so Lyons knows the actual location of its customers. All of this information enables Lyons to validate the identity of potential customers prior to provisioning of service. Lyons will not provide service if a new customer’s identification cannot be verified.

Service Terms: Customers that use Lyons’s telephone service for any unlawful purposes, including unlawful robocalls, are subject to suspension or termination of service.

Use of Call Analytics to Identify and Block Unlawful Traffic

Lyons relies on the call analytics systems employed by its wholesale providers, Momentum and COMMIO, to identify and block unlawful robocall traffic. These systems detect suspicious patterns such as:

- unusually high call volumes from a single number,
- excessive numbers of short-duration calls,
- calls that fail to connect beyond a single ring, and
- calling numbers that are invalid, unallocated, or appear on the Industry Traceback Group’s Do Not Originate (DNO) list.

If Lyons receives a report or alert from Momentum or COMMIO of suspected unlawful robocall traffic originated by a Lyons end-user customer, Lyons will conduct an investigation and take appropriate action, including warning or terminating the customer’s service if necessary.

Knowledge of Upstream Providers

Lyons’ upstream providers are Momentum Telecom, Inc. and COMMIO. Both are well-known, reputable wholesale service providers that are registered in the FCC’s Robocall Mitigation Database. Lyons does not itself have knowledge or insight into the upstream providers from

which Momentum or COMMIO receive traffic, but understands from their filed mitigation plans that both providers maintain direct upstream connections only with service providers that have represented to the FCC that they have policies and procedures to identify and block unlawful robocall traffic.

While Lyons necessarily relies on the robocall mitigation policies, procedures, and safeguards instituted by Momentum and COMMIO, Lyons has also adopted this robocall mitigation plan to take its own measures to limit the potential for the origination of unlawful robocalls by its customers that would be carried and processed by Momentum and other downstream providers.

Cooperation with the Traceback Group, Law Enforcement and Government Agencies

Lyons is committed to responding fully and within 24 hours to all traceback requests made by the Industry Traceback Group (ITG), law enforcement authorities, and government agencies.

Lyons is also committed to cooperating with Momentum and COMMIO on traceback requests and to fully complying with the Commission's robocall blocking requirements. Lyons understands that Momentum and COMMIO will block all calls and provider traffic that: (1) are identified in any public notice or order released by the FCC; (2) are substantially similar to the types of traffic identified in any public notice or order released by the Commission; or (3) include a caller ID number or name that is on DNO list issued by ITG.

