

Robocall Mitigation Program of Western Long Distance, Inc.

Western Long Distance, Inc. (the “Company”) is a “non-gateway intermediate provider,” as that term is defined in Section 64.6300(i) of the rules of the Federal Communications Commission (the “Commission”).

Company Network

The Company’s network consists entirely of portions that carry or process calls in Session Initiation Protocol (“SIP”) (hereinafter “IP-capable”). The Company has, to its understanding, implemented the STIR/SHAKEN authentication framework in accordance with the Commission’s rules and orders applicable thereto¹ by reason of its relationship with the voice service providers with which it is under common management, as described more fully below under the heading “Know Your Customer.” In addition, the Company has implemented a robocall mitigation program that includes the following elements:

Reasonable Steps To Avoid Originating Illegal Robocall Traffic

The Company follows best practices for vetting the identity of subscribers to voice services that it provides, identified more fully under Best Practice #1 set forth in Appendix A to Public Notice DA 20-1526, released December 22, 2020, by the Wireline Competition Bureau of the FCC in WC Docket Nos. 17-97 and 20-324 (“DA 20-1526 Appendix A”).

Do-Not-Originate (DNO) list

We maintain a **reasonable Do-Not-Originate (DNO) list**, including inbound-only government and customer-designated numbers. Calls identified with DNO caller IDs are blocked in real time across all origination, transit, and termination points in accordance with the FCC’s Eighth Report & Order.”

Our network systems integrate industry-standard DNO databases utilizing TNS CGAH (Call Guardian Authentication Hub) and when invoked the calls are blocked.

By submitting this RMP, Western Long Distance, Inc. certifies that it has implemented reasonable DNO blocking measures across the network and is compliant with the FCC’s Do-Not-Originate requirements and Robocall Mitigation Database filing obligations.

¹ The Company understands the term “STIR/SHAKEN authentication framework,” as used in Section 64.6300 of the Commission’s rules as of the date of this document, to refer to a specific authentication framework, namely, the framework described more fully in Paragraph 21 and Note 90 of the Commission’s Sixth Report and Order and Further Notice of Proposed Rulemaking (FCC 23-18) in WC Docket No. 17-97.

603+ Compliance

We have verified with our switch vendor that we are compliant with the FCC requirement to return 603+ when blocking calls using analytics (FCC 25-15). Thus, making every effort to control illegal spam and fraud calls in accordance with the FCC's Eighth Report & Order."

Know Your Customer

The Company is under common management with two "small voice service providers," as that term is defined in Section 64.6304(a)(2) of the Commission's rules. The only persons or entities that are permitted to become customers of the Company are end users of the local exchange services of one or both of those voice service providers, and then only in that capacity. The confirmation of the identity of such end users is performed by one or both of those voice service providers on the Company's behalf. Those voice service providers' "know your customer" programs for retail, end user, voice service customers consists of the practices more fully described above under the heading "Reasonable Steps To Avoid Originating Illegal Robocall Traffic."

Know Your Upstream Provider

The Company's only upstream providers are the two voice service providers mentioned above that are under common management with the Company. By virtue of that common management, the Company knows its upstream providers.

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Contract Provisions

The Company's services to end user customers are governed by written terms and conditions. Those terms and conditions prohibit use of the Company's services for unlawful and/or abusive purposes, and permit suspension or termination of service by the Company for violation thereof.

Commitment

In its capacity as an "intermediate provider," as that term is defined in Section 64.6300(g) of the Commission's rules, the Company is committed to responding within 24 hours to all lawful traceback requests from the Commission, law enforcement, and the industry traceback consortium, and, to the extent permitted by law, to cooperating with such entities in investigating and stopping the use of the Company's services in that capacity to carry or process illegal robocalls by any illegal robocallers.

Dated: March 16th, 2026

Appendix A

Principals, Affiliates, Subsidiaries and Parent Companies

Directors/Officers:

Steve R Winslow

Julia F Henny

George TF Henny

Donna E Hilty

Gary W Ricketts

Parent Companies/Subsidiaries/Affiliates:

Abound Ventures, Inc

Whidbey Telephone Company

Fibercloud, Inc

American Alarm Systems, Inc

