

ClearPath Fiber LLC - Robocall Mitigation Compliance with FCC-23-18A1

ClearPath Fiber LLC (the “Company”) is dedicated to upholding the highest standards of compliance with the regulations set forth by the Federal Communications Commission (FCC). This compliance policy outlines our commitment to meeting the requirements specified in FCC-23-18A1 with adherence to the STIR/SHAKEN standards, ensuring transparency, reliability, and fair practices in providing phone services to our customers. The Company is committed to cooperating with the Federal Communications Commission (FCC), law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocalls that it learns are using our service to originate calls or transit calls into the United States and territories.

The Company has fully implemented STIR/SHAKEN and the Company commits to fully responding to all traceback requests from the ITG, the TPTG, the FCC, and law enforcement.

- The Company shall cooperate with these groups to investigate and stop any Illegal Robocalls from using Company’s service to carry or process illegal calls.
- When notified by the FCC’s Enforcement Bureau, Company shall block and report identified illegal traffic, and any substantially similar traffic, on an ongoing basis (unless Company’s investigation determines that the traffic is not illegal) when Company receives actual written notice of such traffic from the Enforcement Bureau bringing the notification.
- If Company determines that the identified traffic is not illegal, Company shall provide the Enforcement Bureau with an explanation as to why Company reasonably concluded that the identified traffic is not illegal, and what steps it took to reach that conclusion.

The Company utilizes a combination of internal tools and third-party solutions to check for Do Not Originate (DNO) numbers. In addition, the Company utilizes a combination of internal tools and third-party solutions to detect invalid phone number formats, area codes and unassigned number blocks. The Company also utilizes data analytics to detect and investigate irregular and unexpected calling patterns, originating number use against customer profiles.

The Company uses data systems for analytics and reviews to identify illegal robocalling in addition to a Know Your Customer (KYC) requirement to access the Company’s networks. The process includes:

- Monitoring the network to identify suspicious traffic patterns.
- Limiting customers' capacity via call per second and/or concurrent session limits.
- Regularly checking call patterns for possible abusive traffic.
- All new customers are verified with a combination of electronic and manual verification systems, which may include credit reviews, references from trusted industry members, and previous experiences with customer executives and employees.
- The Company severely limits the capabilities of new accounts until these appropriate processes are complete.

ClearPath Fiber LLC has one upstream provider from which it receives voice traffic:

Alianza, Inc.

1064 S North County Blvd

Pleasant Grove, Utah

84062

Phone: 801-802-6400

Email: info@alianza.com