

Texoma Communications, LLC d/b/a TekWav

ROBOCALL MITIGATION PLAN

Texoma Communications, LLC d/b/a TekWav's ("TekWav") underlying voice service provider, Atheral, LLC ("Atheral"), is registered in the Robocall Mitigation Database and performs first-party STIR/SHAKEN authentication on calls.

While TekWav necessarily relies on Atheral's robocall mitigation policies, procedures, and safeguards, TekWav 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 Atheral or other downstream providers.

Know-Your-Customer Policies

Subscriber Vetting: TekWav vets the identity of its customers when entering into an agreement to provide service. As part of this vetting process, the customer provides their legal name, business location, state of incorporation, federal tax ID, and other contact information. This information enables TekWav to validate the identity of potential customers prior to provisioning of service. Service will not be provided if a new customer's identification cannot be verified.

Contractual Terms: TekWav's terms of service prohibit the use of its voice service for fraudulent or unlawful acts or purposes. To the extent a customer is found to have violated TekWav's terms of service, TekWav will take action commensurate with the severity of the customer's offense, including, but not limited to, suspending or terminating the customer's service.

Use of Call Analytics to Identify and Block Unlawful Traffic

TekWav relies on Atheral's use of call analytics systems to identify and block unlawful robocall traffic as set forth in its robocall mitigation plans on file with the FCC. Atheral reports that it uses TransNexus's ClearIP solution to monitor origination traffic and prevent the origination of illegal robocalls. Atheral also reports that its call analytics can detect call patterns that indicate robocall activity, including, but not necessarily limited to, an unusual large number of outbound calls, an excessive number of incoming calls from the same calling number, and calling numbers that are invalid, unallocated, on a Do No Originate ("DNO") list, in the FCC consumer complaint database, or have a poor reputation.

If TekWav receives a report or alert from Atheral of suspected unlawful robocall traffic originated by a TekWav end user customer, TekWav will conduct an investigation and will work internally to identify the party that is potentially originating illegal robocalls. To the extent a customer is found to have violated terms, TekWav will take action commensurate with the severity of the customer's offense, including, but not limited to, providing the customer with a warning or terminating the customer's service.

Knowledge of Upstream Provider

TekWav's sole upstream provider, Atheral, is a well-known, reputable voice service provider that is registered in the FCC's Robocall Mitigation Database. Atheral does not itself have knowledge or insight into the upstream providers from which Atheral receives traffic, but understands from its mitigation plan that it vets its wholesale relationships.

Cooperation with the Traceback Group, Law Enforcement and Government Agencies

TekWav 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 to investigate and address suspected unlawful robocalls originated by TekWav customers.

TekWav is also committed to cooperating with its wholesale provider on traceback requests and to fully complying with the Commission's robocall blocking requirements. TekWav understands that Atheral will block 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 Commissions; or (3) include a caller ID number or name that is on the DNO list issued by the ITG.