

TRACE FIBER NETWORKS, LLC

Trace Fiber Networks, LLC (“Trace”) provides resold Voice over Internet Protocol (“VoIP”) phone service to business and residential customers, as of April 1, 2024, and is considered a voice service provider under Federal Communications Commission (“FCC”) Rule Section 64.6305. Momentum Telecom, Inc. (“Momentum”) is Trace’s underlying voice service provider. Trace relies on procedures, policies, and safeguards implemented by Momentum to ensure that Trace’s residential and business customers are sufficiently protected against robocall and spoofing activities. In reselling Momentum’s VoIP service, Trace has fully implemented the STIR/SHAKEN authentication framework as indicated in the Robocall Mitigation Database. All calls that originate on Trace’s network are subject to the Robocall Mitigation Plan set forth below.

ROBOCALL MITIGATION PLAN

STIR/SHAKEN Implementation

Momentum, Trace’s underlying voice service provider, has fully implemented STIR/SHAKEN. Momentum authenticates Trace’s voice traffic using STIR/SHAKEN, providing A-level attestation for all calls placed by Trace subscribers.

Robocall Mitigation Program

Use of Call Analytics to Identify and Block Unlawful Traffic.

In addition to implementing STIR/SHAKEN on its network, Momentum has also implemented its own call analytics to identify unlawful traffic originated by its own retail customers and the end user customers of its wholesale customers, including Trace. Momentum’s call analytics can detect call patterns that indicate robocall activity, including, but not necessarily limited to, an unusually large number of calls from the same number, an excessive number of short duration calls, and calls that stop attempting to connect after a single ring. Momentum’s call analytics also can detect where the calling number is invalid, unallocated, or on the Industry Traceback Group’s (“ITC”) Do Not Originate (“DNO”) list. If Momentum’s call analytics detect any of the above-described issues with the outbound traffic of a Trace end user customer, Momentum alerts Trace’s contact representative and asks Trace to investigate the issue and thereafter inform Momentum: (i) when the issue is resolved and (ii) what actions Trace took in resolving the issue. Upon receipt of any alert from Momentum, Trace conducts an immediate investigation to determine if the caller was attempting to originate unlawful robocalls. If confirmed, Trace will take appropriate action in accordance with its Acceptable Use Policy which may include issuance of a warning to the customer, account suspension, or account termination.

Know-Your-Customer.

Trace vets each customer upon application for service, entering new or renewal contracts, and/or provisioning network connectivity. Trace confirms the identity of new or renewing

business customers by collecting information concerning the company name and address, physical location of the business, contact information, and the customer's Federal Tax ID, where appropriate. With respect to residential customers, Trace verifies customer name and address, physical service location, and contact information. Trace may also utilize third-party agencies to gauge credit and/or fraud risk associated with a potential business or residential customer.

Description of Contractual Provisions.

Trace's Terms and Conditions, which must be acknowledged by all customers prior to service initiation, include a provision requiring customers to comply with all applicable laws in connection with the customer's use of Trace's services. Pursuant to the Terms and Conditions, in order to protect its network from any unlawful use, Trace may take action, including suspension or termination of service. All customers must also agree to abide by Trace's Acceptable Use Policy, which prohibits customers from engaging in any activity, whether illegal or not, that Trace, in its sole discretion, determines to be harmful to its subscribers, operations, or networks. To the extent a customer is found to have violated its contractual obligations, Trace will take action commensurate with the severity of the customer's offense, including, but not limited to, providing the customer with a warning, suspending or terminating the customer's service, and/or reporting the misconduct to the appropriate authorities.

Know-Your-Upstream Provider.

Trace's sole upstream provider is Momentum, which is registered in the Robocall Mitigation Database and has fully implemented the STIR/SHAKEN framework. Trace relies on procedures and policies implemented by Momentum to mitigate illegal robocalls.

Momentum has confirmed it knows all of its upstream providers from which it directly receives traffic and has insight into its upstream providers' policies and procedures related to identifying and blocking unlawful robocall traffic through Momentum's review of these providers' robocall mitigation plans. Momentum also confirms that all upstream providers from which it receives traffic are listed in the FCC's Robocall Mitigation Database.

Cooperation with Traceback Group, Law Enforcement, and Government Agencies.

Trace will respond fully and in a timely manner to all traceback requests from the FCC, law enforcement, and the ITC, and will cooperate with such entities in investigating and stopping any robocallers that use its network to originate illegal robocalls.

Trace's underlying voice services provider, Momentum, is also committed to responding fully and within 24 hours to all traceback requests made by ITC, law enforcement authorities, and government agencies to investigate and address suspected unlawful robocalls originated or passed to Momentum. Trace has agreed to cooperate with Momentum in responding to ITC traceback requests, as detailed above.

Trace and Momentum are committed to fully complying with the FCC's robocall blocking requirements and Momentum has confirmed that it 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 FCC; or (3) include a caller ID number or name that is on DNO list issued by ITG. Momentum also blocks the traffic of all foreign providers and gateway providers that have not registered in the Robocall Mitigation Database.

Trace reserves the right to modify and/or supplement its Robocall Mitigation Plan to adapt to risks and to improve the overall effectiveness of its program.

Traceback

Trace is committed to cooperating with the FCC, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to originate calls. Trace will respond fully within 24 hours to all traceback requests from the FCC, law enforcement, and the ITC, and cooperate with such entities in investigating and stopping any robocallers that use our service to carry, process, or originate illegal robocalls.