

Clarksville Connected Utilities Robocall Mitigation Certification and Plan

Clarksville Connected Utilities (CCU or Company), a voice provider serving end-users, submits this robocall mitigation certification and attached Robocall Mitigation Plan pursuant to section 64.6305 of the Federal Communications Commission (Commission's or FCC's) rules. CCU has taken specific reasonable steps, as set forth below, to avoid originating and processing illegal robocall traffic.

Momentum Telecom, Inc. (Momentum) is CCU's underlying voice service provider. CCU relies on procedures, policies, and safeguards implemented by Momentum to ensure that CCU's residential and business customers are sufficiently protected against robocall and spoofing activities.

STIR/SHAKEN

CCU is a voice provider without a STIR/SHAKEN obligation. Our underlying voice provider has certified "complete STIR/SHAKEN".

Enforcement

All voice traffic that originates on our network is subject to the attached Robocall Mitigation Plan. CCU 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.

CCU and/or any entity for which the filing entity shares common ownership, management, directors, or control have never been the subject of a formal Commission, law enforcement, regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program. CCU has not been prohibited by the Commission from filing in the Robocall Mitigation Database.

Traceback

CCU commits to cooperate with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any robocallers that use our service to originate unlawful robocalls. CCU will respond fully within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and cooperate with such entities in investigating and stopping any robocallers that use its service to carry, process, or originate robocalls.

Identifying and Other Information

Address: 400 W Main Street Clarksville AR 72830

Other business names in use: Clarksville Light and Water

All business names previously used: Clarksville Light and Water

CCU is not a foreign voice service provider.

Principals, Affiliates, Subsidiaries: None

Parent Company: None

OCN: None

Person within company responsible for addressing robocall mitigation-related issues:

I, Roy Young, General Manager for CCU submits this certification on behalf of the Company, which has implemented the STIR/SHAKEN authentication framework as indicated in the Robocall Mitigation Database. Pursuant to section 1.16 of the FCC's rules, I certify, under penalty of perjury that the information and statements contained herein are true and correct to the best of my knowledge and belief.

A handwritten signature in blue ink, appearing to read "Roy Young", is written over a horizontal line.

Robocall Mitigation Program

CCU has implemented specific reasonable steps, as outlined herein, to mitigate the risk of carrying or processing illegal robocalls on behalf of our customers.

As a reseller, CCU relies on Momentum's call analytics to monitor call traffic. Momentum has implemented its own call analytics to identify unlawful traffic originated by its retail customers and the end users of its wholesale customers' services. 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 whether the calling number is invalid, unallocated, or on the Industry Traceback Group's Do Not Originate (DNO) list.

If Momentum's call analytics detect any of the above-described issues, an internal report is generated that summarizes the issues presented and the applicable wholesale or retail customer that is responsible for the underlying calls. If an analytics report indicates potential illegal robocall activity by a wholesale end user customer, Momentum alerts the wholesale customer's contact representative and asks the customer to investigate the issue and thereafter inform Momentum (i) when the issue is resolved and (ii) what actions the wholesale customer took in resolving the issue. If a Momentum's analytics report indicates potential illegal robocall activity by one of its own retail customers, Momentum conducts its own investigation into the customer and the calls at issue.

CCU'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 our services. All customers must also agree to abide by our Acceptable Use Policy (AUP). If a customer is found to have violated our Terms and Conditions or AUP, the Company 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. When appropriate, CCU may report the misconduct to the appropriate authorities.

Know-your-Customer Processes. Momentum and CCU have adopted know-your-customer processes. CCU vets the identity of its subscribers when approving new or renewal applications for service, provisioning network connectivity, and entering into contract agreements. CCU will confirm the identity of new or renewing business customers by collecting identifying information including, as applicable, SSN, date of birth, contact person for the business, physical address, state and/or country of incorporation, and federal tax ID including a contact person for the business, the physical location of the business, the state and/or country of incorporation, and the federal tax ID. When we install service, CCU reviews caller ID and call records.

Momentum vets the identity of its wholesale customers prior to entering a contract for VoIP services. Momentum's wholesale customers are expected to vet their end user subscribers consistent with the FCC's robocall mitigation rules. Momentum's wholesale contracts prohibit the use of its services to originate unlawful traffic.

Momentum also vets the identity of the customers to whom it provides retail telephone service when: (i) approving an application for service; (ii) provisioning network connectivity; (iii) entering into a contract agreement; or (iv) granting the right to use telephone number resources. Momentum collects from retail customers their name and address, physical location, contact information, and, for business and enterprise customers, their jurisdiction of incorporation, federal tax ID, and nature of business. Momentum may also utilize third-party agencies to gauge credit and/or fraud risk associated with a potential customer. Momentum's

policy is to request additional information from the customer if Momentum cannot validate the customer based on the initial information provided. Momentum will not provide service if a new customer's identification cannot be verified. Through its retail terms of service, Momentum requires its enterprise customers to comply with all applicable laws in relation to its voice services, explicitly prohibiting any abusive or unlawful use of the service.

Know-Your-Upstream Providers. Momentum states that it knows all 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 its review of these providers' robocall mitigation plans. Momentum confirms that all upstream providers from which it receives traffic are listed in the Robocall Mitigation Database.

Traceback. CCU will respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and cooperate with such entities in investigating and stopping any robocallers that use our network to originate robocalls.