

Robocall Mitigation Program Description

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1. Introduction

This Robocall Mitigation Plan is submitted by NXTL, MB pursuant to the provisions of 47 C.F.R. § 64.6305, adopted by the Federal Communications Commission (FCC), which requires all 'voice service providers' to establish a 'robocall mitigation plan.' This document sets forth NXTL, MB's current policies and procedures designed to reduce or eliminate outbound illegal robocalls originating on its network. NXTL, MB views these policies and procedures as constituting 'reasonable steps' to avoid the origination of illegal robocalls on its network. In addition to following these steps, NXTL, MB commits to responding to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG), and to cooperate with such entities in investigating and stopping any illegal robocallers that may use its service to originate calls.

2. STIR/SHAKEN Implementation Status

NXTL, MB has implemented the STIR/SHAKEN authentication framework on portions of its network. We are committed to ensuring that all calls originating on our network undergo caller ID authentication, to mitigate illegal robocalls and spoofed calls.

3. Traceback Requests

NXTL, MB will cooperate with the FCC, law enforcement, and the ITG on all traceback requests and investigations. We will dedicate sufficient resources to promptly complete and provide responses to all traceback requests received from the FCC, law enforcement, and/or the ITG, committing to fully

respond within 24 hours.

4. Customer Vetting Practices

To prevent or minimize the origination of illegal robocalls through our services, NXTL, MB employs strict customer vetting practices. We collect information such as physical location, contact persons, state or country of incorporation, federal tax ID, and the nature of the business.

5. Telephone Number Validation Practices

NXTL, MB uses industry best practices to confirm the right of customers to use telephone numbers associated with their services. We only allow calls from numbers assigned to the subscriber, ensuring secure and valid caller identity.

6. International Call Originators

Currently, NXTL, MB does not provide services to international call originators. If we begin offering such services, we will implement appropriate vetting and validation procedures.

7. Know Your Upstream Provider Procedures

NXTL, MB maintains relationships with upstream providers and ensures they are committed to monitoring their networks to prevent illegal robocalls. Contractual language concerning robocall prevention is included in agreements with upstream providers.

8. Ongoing Robocall Mitigation Practices

NXTL, MB regularly monitors its network for suspicious calling activity and investigates any instances of potential illegal robocalls. We take appropriate action, including traceback investigations and the suspension of services for violators.

9. Third-Party Analytics

NXTL, MB uses third-party analytics to prevent illegal robocalls. Our systems include fraud prevention tools, such as blacklisting, whitelisting, and real-time traffic monitoring.