



Mark Twain Long Distance, Inc. Robocall Mitigation Plan

This Robocall Mitigation Plan describes the specific reasonable steps that Mark Twain Long Distance, Inc. ("Mark Twain") has taken to avoid the origination, carrying, or processing of illegal robocall traffic on its network.

"Know-Your-Upstream Provider" Procedures

Most of the connections that Mark Twain has with upstream providers have been in place for many years, and we know these companies very well. However, Mark Twain exercises due diligence before accepting traffic from any new upstream provider as we seek to ensure that such providers are not using Mark Twain to carry or process a high volume of illegal traffic. Specifically, Mark Twain collects information such as the upstream provider's physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of their business.

Use of Call Analytics Systems

Mark Twain utilizes reporting functionality provided by our billing vendor, Mid America Computer Corporation, to identify and evaluate abnormal calling patterns within call detail records. In the event anything is detected, Mark Twain will reach out to the responsible party to resolve. If Mark Twain were to determine that a customer was using our network to originate illegal robocalls, we would advise them to stop immediately. If the customer did not heed that warning, Mark Twain would not hesitate to terminate their service.

Commitment to Respond to Traceback Requests

Mark Twain commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its services to originate, carry, or process illegal robocalls.