

HOPKINSVILLE ELECTRIC SYSTEM D/B/A ENERGYNET

ROBOCALL MITIGATION PLAN

Hopkinsville Electric System d/b/a EnergyNet (“HES EnergyNet”) is a broadband provider that offers interconnected VoIP services to its subscribers on a resold basis. HES EnergyNet’s wholesale VoIP provider is Momentum Telecom, Inc. (“Momentum”), a provider of wholesale and retail VoIP and other communications services across the United States.

While HES EnergyNet necessarily relies on the robocall mitigation policies, procedures, and safeguards instituted by Momentum, HES EnergyNet 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 Momentum and other downstream providers.

Know-Your-Customer Policies

Subscriber Vetting: HES EnergyNet vets the identity of its customers when approving an application for telephone service. As part of this vetting process, HES EnergyNet collects the customer’s legal name and address, physical location, and contact information, and, for commercial customers, federal tax ID, and HES EnergyNet may require additional information to validate the customer. HES EnergyNet’s services are provided to fixed locations using its own network and services are typically installed on location by its personnel, so HES EnergyNet knows the actual location of its customers. All of this information enables HES EnergyNet to validate the identity of potential customers prior to provisioning of service. HES EnergyNet will not provide service if a new customer’s identification cannot be verified.

Contractual Terms: HES EnergyNet’s Commercial Telecommunications Voice Service Agreement and Residential Voice Service Agreement (the “Service Agreements”) each prohibit the use of HES EnergyNet’s services for any illegal or fraudulent purpose. The Service Agreements provide that HES EnergyNet may terminate the services if HES EnergyNet determines that customer’s use of the services violated the applicable Service Agreement.

Use of Call Analytics to Identify and Block Unlawful Traffic

HES EnergyNet relies on Momentum’s use of call analytics systems to identify and block unlawful robocall traffic as set forth in Momentum’s robocall mitigation plan on file with the FCC. Momentum reports that the call analytics it employs for HES EnergyNet’s traffic can detect call patterns that indicate robocall activity, including, but not necessarily limited to, an unusual 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, and calling numbers that are invalid, unallocated, or on the Industry Traceback Group’s Do Not Originate (“DNO”) list.

If HES EnergyNet receives a report or alert from Momentum of suspected unlawful robocall traffic originated by a HES EnergyNet end user customer, HES EnergyNet will conduct an investigation. To the extent a customer is found to have violated HES EnergyNet’s Service Agreements, HES EnergyNet 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 Providers

HES EnergyNet's upstream provider, Momentum, is a well-known, reputable wholesale service provider that is registered in the FCC's Robocall Mitigation Database. HES EnergyNet does not itself have knowledge or insight into the upstream providers from which Momentum receives traffic, but understands from Momentum's mitigation plan that Momentum's direct upstream connections are with service providers that similarly have represented to the FCC that they have policies and procedures to identify and block unlawful robocall traffic.

Cooperation with the Traceback Group, Law Enforcement and Government Agencies

HES EnergyNet 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 HES EnergyNet customers.

HES EnergyNet is also committed to cooperating with Momentum on traceback requests and to fully complying with the Commission's robocall blocking requirements. HES EnergyNet understands that Momentum 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 Commission; or (3) include a caller ID number or name that is on DNO list issued by ITG.