

ROBOCALL MITIGATION PLAN

I. REGULATORY BACKGROUND

The Telephone Robocall Abuse Criminal Enforcement and Deterrence Act (TRACED Act) requires voice service providers to implement STIR/SHAKEN authentication on Session Initiation Protocol (“SIP”) traffic on carrier networks as well as to implement a Robocall Mitigation Plan (“RMP”) covering non-SIP Time Division Multiplexing (“TDM”) traffic.

Bays-ET Highspeed Internet, LLC (“BET”) serves as a provider of “voice service” as set forth in Section 64.6300(l) of the Federal Communications Commission’s (“Commission”) rules, 47 C.F.R. §64.6300(l). BET’s offerings include plain old telephone service (“POTS”) replacement via ATA, simple telephone systems for small business offices, along with internet access. BET has fully implement the STIR/SHAKEN framework on the network supporting BET’s customer base.

BET hereby submits this RMP to the Robocall Mitigation Database describing and confirming practices, policies, and procedures to mitigate unlawful robocalling, which include the following:

(1) BET’s specific reasonable steps to avoid originating illegal robocall traffic as part of this RMP;

(2) BET’s commitment to respond fully and timely to all traceback requests from the Commission, law enforcement, and the Industry Traceback Group (“ITG”) and to cooperate with such entities in investigating and stopping any illegal robocallers using BET’s service to originate calls; and,

(3) BET’s intent to participate in industry tradeshow, groups, or consortiums, working to strengthen efforts to combat unlawful robocalling, and additional call verification and

authentication solutions.

II. EFFORTS TO AVOID ORIGINATING ILLEGAL ROBOCALLS AS PART OF THE ROBOCALL MITIGATION PROGRAM

BET's transitioning of legacy POTS systems to a digital cloud-based, high-performance network, SIP solution for BET Customers, integrates on-premises phone systems seamlessly replacing traditional copper voice lines without issue. BET meaningful investments in the digital transition includes software technology, equipment and resources to combat illegal robocalls as part of this RMP consistent the most rigorous regulatory and compliance requirements. As part of BET's RMP, BET provides the following affirmative, effective measures to help minimize the impact of illegal or unwanted robocalls, and prevent new and renewing customers from using BET to originate illegal calls:

- **Automatic Number Identification Management:** BET shall block originating telephone numbers if identified based upon patterns of activity.
- **Proactive Blocking.** BET requests underlying carriers to block calls from phone numbers on Do-Not-Originate lists published by US Telecom and Neustar.
- **General Terms and Conditions.** BET prohibits Customers from originating fraudulent calling using any fraudulent means, devices, or technologies. In fact, BET's end user Customer Terms and Conditions permit BET, without notice, to discontinue, block or suspend Services if necessary to prevent fraud, scams, tampering, schemes, false or invalid numbers. In short, BET shall block or suspend the Service of any Customers originating unlawful robocalls through BET. BET's Robocall Mitigation Program includes an increasing investment in resources over time to further strengthen adherence to compliance requirements by Customers.
- **Acceptable Use Policy.** BET's Acceptable Use Policy ("AUP") also prohibits

Customers from utilizing the Service for any illegal, fraudulent, objectionable and/or unauthorized manner, reserving the sole and absolute right to deny, restrict or immediately suspend or terminate Service if the use of the Service by the Customer, or anyone having access to or using the Service, either violates the BET AUP or includes unlawful conduct.

- **Underlying Network Provider.** BET works with underlying providers and supports the benefit of deploying systems to detect potential robocall activity relying upon statistics such as average call duration, ASR, and call count carrier/consumer reports. BET's regulatory compliance counsel confirms that BET's underlying carriers maintain compliance with fully implemented STIR/SHAKEN protocols through the date of this RMP.
- **Traffic Reports and Industry Information.** Reports generated by Call Detail Record and pattern trends, fraud information sharing through industry organizations, and third-party notifications and complaints, may identify potential unlawful robocalling. Although no evidence exists suggesting BET in any way originates illegal robocall campaigns, in any instance where unlawful calling is identified, BET maintains contractual ability to take any action it deems necessary to eliminate the fraudulent activity.

III. Customer Vetting

BET maintains a comprehensive Customer vetting process to meet "Know Your Customer" ("KYC") obligations. This KYC vetting process provides an understanding of the nature of activities for any new and existing Customers. Identifying and understanding Customers through this KYC vetting process diminishes the opportunity to use BET's network for spoofed or illegal traffic.

IV. ACTIVE INTERFACE WITH UNDERLYING PROVIDERS

BET offers voice Services using over physical lines or connections sold by BET to Customers relying upon the physical networks of underlying providers for call termination, call origination, 911 and assigning working telephone numbers. BET has fully implement the STIR/SHAKEN framework on the network supporting BET's entire Customer base. In addition to contractual mechanisms, BET interfaces with underlying providers with regard to a number of important service and network issues, including measures combatting unlawful robocalling along with authentication solutions.

V. COMMITMENT TO RESPONDING TO TRACEBACK REQUESTS

At no time since inception has BET been suspected or investigated for carrying illegal robocalls originating on BET's network. Further, no Commission, law enforcement, or other regulatory action or investigation exists involving BET due to unlawful robocalling or spoofing. Finally, no law enforcement or Commission action bars BET from the RMD. BET remains committed to maintaining this level of compliance and will respond fully and timely to all traceback requests from the Commission, law enforcement, and the ITG and to cooperating with such entities in investigating and stopping illegal robocallers using BET service to originate calls. BET commits to working with the FTC and state attorney general counsels participating in traceback, further demonstrating commitment to such important efforts.

VI. ONGOING COMPLIANCE

BET will continue to fully comply with all conditions set forth in the Commission's Orders mandating the implementation of the STIR/SHAKEN framework, as well as with the Commission's rules and policies more generally.

Should BET detect a pattern of questionable activity, BET will require its customer to remedy the problem and, if effective action is not taken, service to the customer may be suspended and/or terminated.

BET will cooperate with state and federal regulators to prevent any and all illegal robocalls. BET will provide valid law enforcement and regulatory agencies with the relevant non-proprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities and implement mandated robocall mitigation procedures to the fullest extent possible with the goal of maximizing the mitigation of illegal robocalls.

VII. COMPANY INFORMATION

- BET operates under the business name Bays-ET Highspeed Internet, LLC.
- BET's primary address is 517 W Osage Street, Pacific Missouri 63069.

The name, title, department, business address, telephone number, and email address of one person within the company responsible for addressing robocall mitigation-related issues follows:

Chris Bay
Member, CEO
517 W Osage Street
Pacific, MO
63069
(636) 742-2828

| chris@bays-et.com

CERTIFICATION

I, Chris Bay, Managing Member of BET, do hereby certify, under penalty of perjury, the following:

- a. BET fully implemented STIR/SHAKEN requirements in IP portions of its network
- b. BET business name and primary address follows:

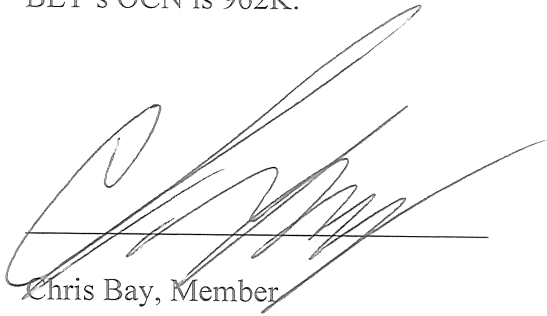
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chris@bays-et.com

- c. Entities owning 10% or more of BET include: none. BET has no subsidiaries or affiliates. BET is not a foreign provider.
- d. BET has had no licenses revoked by the Commission and has not been subject to enforcement action by the Commission.
- e. BET does not operate under any other business name.
- f. BET has not previously used or operated under any other business name.
- g. The name, title, department, business address, telephone number and email address of the individual responsible for addressing robocall-related issues for the Robocall Mitigation Plan follows:

Chris Bay
Member, CEO
517 W Osage Street
Pacific, MO
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- h. BET has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.

- i. BET is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- j. BET's OCN is 962K.



Chris Bay, Member