

EZEE FIBER ROBOCALL MITIGATION PLAN

Below is the Robocall Mitigation Plan (the “**Plan**”) for Ezee Fiber Texas, LLC d/b/a Ezee Fiber and its subsidiary Tachus CLEC, LLC d/b/a Tachus Communications (collectively, “**Ezee Fiber**”) that applies to its interconnected voice-over internet protocol (“**VoIP**”) services that it offers to its customers on a reseller basis. Ezee Fiber’s wholesale VoIP provider is Momentum Telecom, Inc. (“**Momentum**”), a provider of wholesale and retail VoIP and other communications services across the United States.

Ezee Fiber necessarily relies on the robocall mitigation policies, procedures, and safeguards instituted by Momentum. Ezee Fiber has also adopted this Plan to take its own measures to limit the potential for the origination of unlawful robocalls by its customers.

Know-Your-Customer Policies

Subscriber Vetting: Before commencing VoIP services for new customers, or renewing service contracts for existing customers, Ezee Fiber vets the identity of prospective customers by collecting the customer’s legal name, billing address, service address, contact information, and, for commercial customers, federal tax identification number, and it may require additional information to validate the customers. Ezee Fiber’s services are provided to fixed locations using its own network and services are typically installed on location by its employees or contractors, so Ezee Fiber knows the actual service location of its customers. All of this information enables Ezee Fiber to validate the identity of potential customers prior to providing the services. Ezee Fiber will not provide services if a new customer’s identification cannot be verified.

Contractual Terms: Ezee Fiber’s terms of service for voice offerings, including its acceptable use policy, (collectively, the “**Service Terms**”) prohibit use of the service for unlawful purposes, permit Ezee Fiber to monitor use of the service for compliance, and allow for termination of the service at Ezee Fiber’s discretion. The Service Terms allow Ezee Fiber to monitor customer usage to determine whether abnormal, unreasonable, or impermissible use is occurring based upon use of the service as evaluated in comparison to other similarly situated customers. Under the Service Terms, Ezee Fiber maintains the right (in its sole discretion) to terminate service plans in the event of use of the service, any feature and/or any device in a way that is inconsistent with the normal use of the service. In the event that a customer does not immediately comply with these terms, Ezee Fiber retains the right to immediately suspend the customer’s account and service and also retains the right to remove or block communications upon suspicion of a violation of the terms. Finally, Ezee Fiber retains the right to forward the relevant communication (including the customer’s identity) to the appropriate authorities for investigation and prosecution in the event that Ezee Fiber believes that a customer’s use is for an unlawful purpose.

Use of Call Analytics to Identify and Block Unlawful Traffic

Ezee Fiber 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 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 (“**ITG**”) Do Not Originate (“**DNO**”) list.

If Ezee Fiber receives a report or alert from Momentum of suspected unlawful robocall traffic originated by an Ezee Fiber end user customer, Ezee Fiber will conduct an investigation. To the extent a customer is found to have violated its Service Terms, Ezee Fiber 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

Ezee Fiber’s upstream provider, Momentum, is a well-known, reputable wholesale service provider that is registered in the FCC’s Robocall Mitigation Database. Ezee Fiber 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

Ezee Fiber is committed to responding fully and within 24 hours to all traceback requests made by the ITG, law enforcement authorities, and government agencies to investigate and address suspected unlawful robocalls originated by Ezee Fiber customers.

Ezee Fiber is also committed to cooperating with Momentum on traceback requests and to fully complying with the Commission’s robocall blocking requirements. Ezee Fiber 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 the ITG.