

Robocall Mitigation Plan:

AXO Communications, LLC ("AXO") is a qualifying CLEC pursuant to 47 C.F.R. §61.26(a)(1) in the state of Iowa. It provides wholesale services on an intrastate and interstate within the United States as a facility-based CLEC.

In accordance with 47 C.F.R. § 64.6305(a)(2), AXO herewith submits its Robocall Mitigation Program (the "Program"). This Program outlines steps taken by AXO to mitigate and assist with implementation of the STIR/SHAKEN authentication framework in the marketplace including its practices and procedures to prevent and mitigate illegal robocalls. AXO is dedicated to eliminating illegal calls from originating and/or traversing its network.

Traffic traversing the AXO network is generally wholesale in nature. As such, all AXO contracts ("Contract(s)") with its Customers contain Terms of Service and Acceptable Use Policy that clearly requires that all traffic traversing its network must be STIR/SHAKEN compliant. If a violation is found, the contract is subject to immediate termination. If AXO detects calls that it believes to be illegal, the Customer's confidentiality under its Contract is void and their information will be shared with Regulatory Agency enforcers.

As an intermediate carrier, AXO contracts directly with its Customers. Those Contracts mandate that all traffic traversing AXO's network is coming from a carrier that is attested as compliant with STIR/SHAKEN authentication framework. AXO only accepts authenticated traffic for termination from carriers and service providers that are confirmed as compliant within the Robocall Mitigation Database. Each Contract contains reasonable steps to avoid carrying illegal robocall traffic that includes a commitment to respond fully and expeditiously to all traceback requests from the FCC, law enforcement entities and the industry traceback consortium.

AXO commits to respond to all traceback requests from the Commission, law enforcement, and the industry traceback consortium. Additionally, AXO will cooperate with such entities when investigating and stopping any illegal robocallers that use its service to originate calls. Therefore, almost all of AXO's voice traffic that originates on its network is authenticated with STIR/SHAKEN. Any remaining voice traffic that originates on its network is subject to a robocall mitigation program.

AXO's voluntary application of the "know your upstream provider" is a key element in AXO's eradication of Robocalling over its network. AXO's products and services are wholesale in nature. AXO's contracting process includes collecting all pertinent information such as physical business address, primary contact person, state or county of incorporation, Federal Tax ID (if applicable), as well as the Customer's FCC Filer ID for FUSF exemption, etc.

The FCC Order lists three affirmative obligations for voice service providers:

- (1) Respond to traceback requests from the Commission, civil and criminal law enforcement, or the Industry Traceback Consortium;
- (2) Take steps to effectively mitigate illegal traffic when it receives notification of such traffic from the Commission through its enforcement bureau; and
- (3) implement effective measures to prevent new and current customers from using its network to originate illegal calls.

AXO agrees to comply with efforts to trace back the source of suspected robocalls. We cooperate with traceback requests received directly from carriers, industry associations, and law enforcement. AXO creates and maintains searchable call detail records.

AXO's Mitigation efforts include:

- Monitoring calling patterns to identify fraudulent traffic.
- Blocking services to a Customer if it determines that the Customer is using the services for any illegal activities or robocalling. The offending Customer's Contract will be terminated.
- AXO will only accept traffic for termination from carriers and operators that are in the Robocall Mitigation Database. AXO does not knowingly accept auto-dialed traffic. All calls must have valid caller-ID values. Each Customer must have a call-per-second limit commensurate with the traffic description contained within the Contract.
- AXO monitors the traffic moving through its network. AXO frequently analyzes CDRs. Call durations are inspected to ensure that no dialer traffic is being sent by Customers. Call volumes and caller-ID utilizations are reviewed to spot changes that could be indicative of foul play.

AXO is committed to act promptly and decisively on anything suspicious detected by its monitoring. AXO looks beyond the Customer involved, adjusting its network parameters consistent with industry standards.