

Robocall Mitigation Plan

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1. Company Overview

Fourway is a voice service provider offering retail voice services to residential and business customers within the United States. Fourway provides customer onboarding, service provisioning, equipment installation, billing, and customer support functions.

Voice services are delivered using hosted Voice over Internet Protocol (VoIP) infrastructure provided by Atheral LLC, a wholesale VoIP service provider. Atheral LLC maintains and operates the underlying switching infrastructure, telephone numbering resources, caller authentication systems, and network monitoring platforms used to deliver voice services.

Fourway does not operate independent voice switching infrastructure and relies on Atheral LLC's compliant network for call processing and authentication functions.

2. STIR/SHAKEN Implementation Status

STIR/SHAKEN caller ID authentication is implemented within the network infrastructure operated by Atheral LLC.

Calls originated through Fourway's retail voice services are authenticated through Atheral LLC's systems where technically feasible. Fourway therefore certifies that calls carried on its behalf are subject to STIR/SHAKEN implementation through its wholesale provider, and any traffic not fully authenticated is subject to the robocall mitigation practices described below.

3. Know Your Customer Procedures

Fourway implements customer verification procedures prior to activating voice service accounts. Voice services are provisioned only to verified customers associated with identifiable billing accounts and verified service locations.

Customer identity and contact information are collected during account creation, and services are typically installed at confirmed physical service addresses. These practices reduce the risk of anonymous access to telecommunications services and help prevent unlawful robocall origination.

4. Acceptable Use Policy

All subscribers must agree to Fourway's Acceptable Use Policy prior to activation of voice services.

The Acceptable Use Policy prohibits customers from:

- Originating illegal robocalls
- Transmitting fraudulent or scam communications
- Spoofing caller identification information without authorization
- Violating applicable local, state, or federal telecommunications laws
- Using services in connection with unlawful or deceptive practices
- Violation of these policies may result in service suspension or termination.

5. Telephone Number Assignment and Validation

Telephone numbers used with Fourway's voice services are assigned and managed through Atheral LLC's provisioning systems.

Fourway does not independently issue numbering resources. Caller identification usage must comply with authorization and validation procedures enforced through Atheral LLC's platform to prevent unauthorized caller ID spoofing.

6. Traffic Monitoring and Robocall Mitigation Measures

Network-level traffic monitoring and robocall mitigation analytics are performed by Atheral LLC using automated monitoring and reputation-based analysis tools designed to identify suspicious calling behavior.

These mitigation measures include, but are not limited to:

- Detection of invalid or unallocated caller identification numbers
- Monitoring for abnormal call volume patterns
- Identification of high-frequency outbound calling behavior
- Detection of short-duration call anomalies
- Monitoring for traffic pumping patterns
- Review of Answer-Seizure Ratio (ASR) and call completion irregularities
- Analysis of call detail records against expected usage patterns
- Screening against known Do Not Originate and reputation databases

If suspicious activity is detected, Atheral LLC notifies Fourway for investigation and corrective action.

7. Traceback Cooperation Commitment

Fourway commits to responding fully and promptly to all traceback requests from the Federal Communications Commission, law enforcement agencies, state attorneys general, and the Industry Traceback Group.

Fourway will cooperate with Atheral LLC and relevant authorities to investigate and mitigate any illegal robocalling activity identified as originating from services provided to its customers.

8. Enforcement and Mitigation Actions

Upon identification of suspicious or unlawful calling activity, Fourway will:

- Investigate the associated customer account,
- Coordinate with Atheral LLC regarding network findings,
- Notify the customer when appropriate,
- Require corrective action,
- Suspend or terminate service for violations of policy or law.

These enforcement actions are intended to prevent continued unlawful robocall activity.

9. International Service Statement

Fourway does not provide voice origination services to subscribers located outside the United States.

10. Ongoing Compliance

Fourway will maintain and update its robocall mitigation practices as necessary and will update its Robocall Mitigation Database certification within ten business days of any material change to its mitigation program or contact information, consistent with FCC requirements.