

NORTHWEST ARKANSAS NETWORK SERVICES, LLC

ROBOCALL MITIGATION PROGRAM

Northwest Arkansas Network Services, LLC (dba NWANS, LLC; "NWANS") is a small, voice service provider ("VSP") in Bentonville Arkansas. NWANS is a reseller of white-labeled services offered by PayG, LLC (dba Skyswitch; "Skyswitch") (FRN 0027004217; OCN: 738j) for which NWANS does not control the soft switch or call trunking for the associated calls. In the Second Caller ID Authentication Report and Order, 36 FCC Rcd 1859, 1868, para. 19 (citing First Caller ID Authentication Report and Order, 35 FCC Rcd at 3260, para. 40), the Commission stated that such providers do not have a STIR/SHAKEN obligation ("And we clarified that voice service providers which lack control over the network infrastructure necessary to implement STIR/SHAKEN are not subject to our implementation requirements.") NWANS uses Skyswitch for purchasing and porting numbers. NWANS purchases origination, termination, and hosted-switch access which also provides crucial elements of our RMP as part of Skyswitch's interconnected white-label VoIP wholesale services to NWANS. All voice traffic that originates on our network is subject to the RMP described below, and customers have the ability to block numbers and set rules.

Know Your Customer

NWANS, in partnership with Skyswitch, follows the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>), including investigating new and renewing customers seeking access to high-volume origination services and, if necessary and possible, modifying service terms and conditions to mitigate the potential of any new or renewing customer originating illegal robocalls. NWANS confirms the identity of all of its customers including, but not limited to (i) contract person(s); (ii) business location, (iii) state or country of incorporation, (iv) federal tax identification, and (v) nature of our customer's businesses.

International Subscribers

NWANS does not sell origination or termination services to subscribers outside the United States.

Contractual Terms - Acceptable Use Policy

NWANS maintains Terms and Conditions ("T&C") for use of our broadband or voice

services. Among other things, these T&C prohibit:

- Use for any criminal or unlawful purposes;
- Use for the transmission, creation, or storage of any material in violation of any State or Federal laws or regulations, including, but not limited to; any material:
 - That is in violation of United States Copyright laws;
 - That is in violation of United States Trade Secret Laws;
 - That is in violation of United States Trademark Laws;
 - That is threatening or obscene; or
 - That is in violation of the Electronic Communications Privacy Act of 1986, Cit.18 U.S.C. 2150 et. Seq.

Customers are informed that any violation of use of the services may result in termination of service.

Traceback Requests

NWANS is committed to respond within 24 hours to all traceback requests from the Federal Communications Commission, law enforcement, Skyswitch, and the industry traceback consortium. Furthermore, NWANS is committed to cooperating with such entities in investigating and stopping any illegal robocallers that use NWANS service to originate calls. Subscribers are required to comply with traceback requests via our T&C. Traceback requests can be sent to support@nwans.com for immediate processing by NWANS.

Telephone Number Validation

If a subscriber wishes to use a telephone number (TN) as a caller identity and that TN is not directly managed by NWANS, or our wholesale partner Skyswitch, TN validation is necessary by requiring the subscriber to provide a valid letter of authorization that they are an authorized user of such TN.

Invalid Numbers or Offending Origination Calls:

Currently, Skyswitch reports they are tracking calls that pass through their network with an invalid DID, and those calls are not signed with an attestation. Skyswitch also promises in the future, calls with invalid DIDs will not be allowed to egress their Network, except 911 Calls.

STIR/SHAKEN Implementation and Updates

Pursuant to FCC filings, Skywitch has complete STIR/SHAKEN implementation. NWANS will continue to monitor industry best practices and review internal processes to ensure our systems will adapt to address the ongoing challenges affecting this industry.