



MILLRY COMMUNICATION, INC.

Millry Communication, Inc. Robocall Mitigation Program

This Robocall Mitigation Plan describes the specific reasonable steps that Millry Communication, Inc. (“MCOMM”), has taken to avoid the origination, carrying, or processing of illegal robocall traffic in its network.

Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Robocalls

MCOMM has a “know-your-customer” policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. MCOMM verifies the identity of all new and renewing customers, including confirming their service address. We also verify customers’ credit history.

MCOMM’s business customers are small businesses that are physically located in our service territory. Prior to a new business customer ever making a call, we personally know, or get to know, the business owners and/or management and their business reputation. This personal touch gives MCOMM a clear view of whether the business is a risk for originating illegal robocalls.

MCOMM has never received a request for high-volume origination services. However, were MCOMM to ever receive such a request, we would exercise caution and investigate the requesting entity extensively prior to granting access to the service. In particular, we would collect information such as their physical business location, contact person(s), state or country of incorporation, federal tax ID, and the general nature of their business.

MCOMM’s customers can originate calls only from a number that identifies in the company’s switches as a number that has been assigned to them. This prevents customers from originating calls with a spoofed caller ID number, which greatly mitigates the likelihood of illegal robocalls originating on MCOMM’s network.

MCOMM’s standard current customer service agreement states that customers are expected to use their services only for legal purposes. In addition, MCOMM’s policies define the circumstances by which it will deny, suspend, or terminate service to a customer, including if a user breaches the customer service agreement. MCOMM would not hesitate to suspend or terminate service to a customer that it discovered was using, or attempting to use, MCOMM’s network to originate illegal calls.

“Know-Your-Upstream Provider” Procedures

Currently, the only upstream providers from which MCOMM receives traffic are AT&T and TDS. MCOMM’s connections with these providers have been in place for many years, and we know them very well. MCOMM has reviewed AT&T’s and TDS’s robocall mitigation plans to learn how they monitor their originating traffic to mitigate illegal robocalls.

Before accepting traffic from any new upstream provider, MCOMM would exercise due diligence and seek to ensure that the provider is not using MCOMM to carry or process a high volume of illegal traffic. Specifically, MCOMM would collect information such as the upstream provider’s physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of their business.

In addition, MCOMM incorporates traceback and prohibited traffic language in all contractual agreements with upstream providers.

Use of Call Analytics Systems

MCOMM does not presently use any call analytics systems to identify and block illegal robocall traffic.

Commitment to Respond to Traceback Requests

MCOMM commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium and to cooperate with such entities in investigating and stopping any illegal robocallers that use its services to originate, carry, or process illegal robocalls.