

FIBERFIRST

Robocall Mitigation Plan

This Robocall Mitigation Plan covers the following affiliated entities (collectively, “FiberFirst” or the “Company”) that provide voice services:

- FiberFirst, LLC, which provides wholesale VoIP services to its affiliates by reselling the white-labeled VoIP services of Alianza, Inc.
- FiberFirst Arizona, LLC, which provides retail VoIP services by reselling the VoIP services of FiberFirst, LLC.
- FiberFirst DFW, LLC, which provides retail VoIP services by reselling the VoIP services of FiberFirst, LLC.
- FiberFirst Nebraska, LLC, which provides retail VoIP services by reselling the VoIP services of FiberFirst, LLC.
- FiberFirst SoCal, LLC, which provides retail VoIP services by reselling the VoIP services of FiberFirst, LLC.

I. Overview

The FCC requires that voice service providers and intermediate providers,¹ regardless of whether they are required to implement STIR/SHAKEN, file certifications and robocall mitigation program description in the Robocall Mitigation Database. FiberFirst adopts this robocall mitigation program to establish procedures to limit the potential for originating, carrying, or processing unlawful robocalls through its voice services and to satisfy the requirements of 47 C.F.R. § 64.6305(d)(2).

The Commission requires voice service providers to develop a robocall mitigation program that:

- details the reasonable steps taken to avoid originating illegal robocalls;
- describes how the provider complies with its obligation to know its customers (47 C.F.R. § 64.1200(n)(4)) and any procedures in place to know its upstream provider(s);
- describes the analytics system(s) used to identify and block illegal traffic (including any third-party analytics vendor(s) and their name(s));
- commits to fully respond to traceback requests and to cooperate with investigating and stopping illegal robocalls;
- is filed (and maintained/updated as required) in the Robocall Mitigation Database.

FiberFirst does not control the softswitch, number porting, or call tracking for the associated calls. Therefore, FiberFirst lacks control over the network infrastructure necessary to implement STIR/SHAKEN. Further, FiberFirst is incapable of obtaining a Service Provider Code token due to

¹ FiberFirst does not act as a gateway provider and does not receive calls directly from foreign originating or intermediate providers at U.S.-based facilities.

Governance Authority policy. Pursuant to 47 C.F.R. § 64.6304(b), FiberFirst is exempt from the requirements of Section 64.6301.

FiberFirst's underlying origination provider, Alianza, fully implements STIR/SHAKEN and attests all voice calls made from the FiberFirst network. Specifically, Alianza authenticates and signs calls for FiberFirst using Alianza's certificate consistent with the Commission's rules and the ATIS standards.

In accordance with 47 C.F.R. § 64.6305(d)(4)(v), FiberFirst has designated a point of contact to receive notice of any illegal robocall traffic or other robocall mitigation-related issues. That person's name, title, address, telephone number, and email address are available within the Robocall Mitigation Database.

II. General Prohibition Against Illegal Robocalling

FiberFirst end user services are subject to restrictions contained in its published legal notices and all executed service orders include the requirement that service is provided pursuant to its Terms of Service (TOS).

FiberFirst's TOS prohibits activities normally associated with illegal robocalling, including, but not limited to:

- originating, facilitating, or transmitting illegal robocalls (including calls that violate applicable federal or state law or FCC rules);
- unlawfully spoofing caller ID or providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable local, state, or federal law;
- using the FiberFirst service to engage in or in connection with fraudulent activities.

FiberFirst may take action up to and including suspension or termination of service for violation of the TOS.

III. Know Your Customer

FiberFirst, in partnership with Alianza, utilizes the mitigation technique of "Know Your Customer." Prior to initiating service, FiberFirst collects the customer's legal name, address, and contact information and validates the customer's identity. For business customers, FiberFirst also collects the name/title of an authorized representative and confirms authority to request service. FiberFirst will not provide services if the customer does not provide the information requested.

IV. Know Your Upstream Provider

FiberFirst, LLC has a written agreement in place with Alianza to resell Alianza's VoIP offering to FiberFirst's customers. FiberFirst has confirmed that Alianza is listed in the Robocall Mitigation Database and that its filed Robocall Mitigation Plan has "Know Your Upstream Provider" provisions.

V. Network Monitoring and Management

FiberFirst's end-user services are subject to network monitoring that monitors against illegal robocalls such as high call volumes and high call duration. Designated employees review all flagged call patterns and actively resolve issues as quickly as possible. If the end-user is uncooperative, FiberFirst will implement mitigation activities not limited to suspension or termination of service.

Alianza also has implemented a proprietary fraud detection and mitigation process that analyzes high-volume network traffic to evaluate compliance. Alianza utilizes a variety of fraud detection indicators and fraud prevention best practices.

Calls from the FiberFirst network are routed through Alianza for verification and call authentication.

Alianza also takes remedial action to prevent or remediate robocalling or other fraudulent activity it detects on its customers' systems.

If FiberFirst's upstream provider Alianza determines the call did not originate from FiberFirst, the call will not be certified and/or may be blocked, subject to Alianza's policies and any applicable contractual arrangements. Alianza utilizes proprietary and third-party fraud detection and mitigation process through which it analyzes high-volume network traffic to evaluate compliance with a variety of fraud detection indicators and fraud prevention best practices

VI. Traceback and Enforcement Cooperation

FiberFirst commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and The Industry Traceback Group, and to cooperate with such entities in investigating and stopping illegal robocallers that use FiberFirst's service to originate illegal robocalls. FiberFirst will dedicate sufficient resources to provide prompt and complete responses to traceback requests.

VII. Formal Investigations

At no time in the prior two years has FiberFirst (or any entity with which it shares common ownership, management, directors or control) been prohibited from filing in the Robocall Mitigation Database or been the subject of a formal FCC, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to FiberFirst transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

VIII. Ownership and Management

FiberFirst is a privately held company. Attached as Exhibit A is a list of affiliates, subsidiaries, and parent companies of FiberFirst. Below is a link to Ubiquity's website for more information on FiberFirst's principals: <https://ubiquitygp.com/team/>.

Version: March 2026

Change summary: Updates initial version with additional details regarding compliance.

EXHIBIT A

Affiliates / Subsidiaries / Parent Entities

This Robocall Mitigation Plan is applicable to the following service provider entity subsidiaries of Generate-Ubiquity Management, LLC ("Voice Service Providers"):

- FiberFirst, LLC
- FiberFirst Arizona, LLC
- FiberFirst DFW, LLC
- FiberFirst Nebraska, LLC
- FiberFirst SoCal, LLC

The business address for each Voice Service Provider is:

121 W Trade St., Suite 1275
Charlotte, NC 28202

Ultimate Parent Company:

The name and address of the ultimate parent company of each Voice Service Provider listed above is:

Generate-Ubiquity Management, LLC
560 Davis Street, Suite 250
San Francisco, CA 94111

Principals Exercising Management or Control:

The principals exercising management or control for each Voice Service Provider are available on at: <https://ubiquitygp.com/team/>.

Parents, Affiliates and Subsidiaries:

The following entities are the parents, affiliates and subsidiaries of the Voice Service Providers:²

- FiberFirst Arizona, LLC
- FiberFirst DFW, LLC
- FiberFirst Nebraska, LLC
- FiberFirst SoCal, LLC
- FiberFirst, LLC
- Generate-Ubiquity Holdings, LLC
- Generate-Ubiquity Management, LLC
- Generate-Ubiquity Services, LLC

² While each Voice Service Provider is listed, each such entity is listed only as an affiliate to the other Voice Service Providers.

- Generate-Ubiquity Smart Buildings, LLC
- Generate-Ubiquity Smart Cities I, LLC
- Millennium Telcom, L.L.C.
- Ubiquity Arizona, LLC
- Ubiquity CA, LLC
- Ubiquity California, LLC
- Ubiquity DFW, LP
- Ubiquity Edge, LLC
- Ubiquity Fiber Networks, LLC
- Ubiquity Florida, LLC
- Ubiquity IA, LLC
- Ubiquity Idaho, LLC
- Ubiquity Illinois, LLC
- Ubiquity Kansas, LLC
- Ubiquity Louisiana, LLC
- Ubiquity Minnesota, LLC
- Ubiquity Missouri, LLC
- Ubiquity NC, LLC
- Ubiquity Nebraska, LLC
- Ubiquity North Dakota, LLC
- Ubiquity OK, LLC
- Ubiquity SoCal, LLC
- Ubiquity South Dakota, LLC
- Ubiquity Warehouse Borrower, LLC
- Ubiquity Warehouse DFW ClusterCo, LLC
- Ubiquity Warehouse Nebraska ClusterCo, LLC
- Ubiquity Warehouse Pledgor, LLC
- Ubiquity Warehouse SoCal ClusterCo, LLC
- Ubiquity Washington, LLC
- Ubiquity Wisconsin, LLC