

Bluepeak ROBOCALL MITIGATION PLAN

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

- Clarity Telecom, LLC d/b/a Bluepeak (“Clarity”)
- Bluepeak ABS Asset Entity I, LLC (“Bluepeak ABS”)
- Bluepeak BTS Borrower, LLC (Bluepeak BTS”)

Clarity, Bluepeak ABS and Bluepeak BTS are all voice service providers. Bluepeak BTS, an ILEC, is also an intermediate provider. Bluepeak is without a STIR/SHAKEN implementation obligation with respect to that portion of Bluepeak’s network that is still non-IP and qualifies for a continuing extension of the authentication requirement on the non-IP portions of their networks pursuant to 47 CFR § 64.6303(a)(2) and 64.6304(d). On the non-IP portions of its network, Bluepeak relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

With respect to any IP portions of Bluepeak’s network, the infrastructure routing IP traffic is owned and operated by third party, hosted voice providers, namely Momentum Telecom, Inc. and Alianza, Inc. (the “Third-Party Providers”), and they are tasked with implementing the STIR/SHAKEN protocol for the IP portion of our network.

Bluepeak has implemented the following Robocall Mitigation Plan to detect and prevent unlawful robocalls from originating on its network.

All calls that originate on Bluepeak’s network are subject to the described robocall mitigation plan.

Bluepeak monitors its call detail records for patterns indicative of originating robocalls. Bluepeak’s TDM switch also has the ability to generate reports identifying any detected suspicious call activity, patterns or other anomalies such as:

- High-volume voice network traffic
- Large bursts of calls in a short timeframe
- Short duration calls
- Low average call duration
- Sequential dialing patterns
- Neighbor spoofing patterns

Bluepeak examines the reports, investigates the calls and identifies the source of the originating calls as unlawful or legitimate.

The Third-Party Providers also implement analytics/fraud tools to identify and block illegal traffic.

Bluepeak blocks calls originating from invalid numbers and calls from Do Not Originate (“DNO”) databases by default.

If it is determined a Bluepeak customer is originating prohibited unlawful robocalls on our network, Bluepeak will either warn the customer to stop or terminate their service as allowed per Bluepeak’s policy.

Traceback

Bluepeak is committed to cooperating with the FCC, law enforcement, the industry traceback consortium and the Third-Party Providers in investigating and stopping any illegal robocallers that we learn are using our service to originate calls. We respond within 24 hours to all traceback requests from the FCC, law enforcement, the industry traceback consortium and the Third-Party Providers. Bluepeak will dedicate sufficient resources to provide prompt and complete responses to traceback requests.

Know Your Customer

Bluepeak has procedures in place to prevent new and renewing customers from using our network to originate illegal robocalls. Bluepeak thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services.

Further, Bluepeak's Residential User Agreement prohibits the use of its services for fraudulent, abusive, unlawful or destructive purposes, which includes illegal robocalls. Bluepeak may take protective action against such prohibited use including blocking customer traffic.

Know Your Upstream Provider

Bluepeak knows all carriers from which it receives traffic, has confirmed that all its connected carriers are listed in the Robocall Mitigation Database and incorporate traceback and prohibited traffic language in all contractual agreements with carriers.

With respect to IP-based traffic, Bluepeak has written agreements with the Third-Party Providers to authenticate caller identification information. Bluepeak has confirmed that its Third-Party Providers are compliant with, and have a current Robocall Mitigation Plan filed with, the RMD.

Database Eligibility

No Bluepeak entity has been prohibited from filing in the RMD.

Formal Investigations

At no time in the prior two years has Bluepeak (or any entity with which it shares common ownership, management, directors or control) 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 Bluepeak transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

Ownership and Management

Bluepeak is a privately held company. The ultimate parent of Bluepeak is GI DI Rushmore TopCo, LLC. Exhibit A contains a list of affiliates, subsidiaries, and parent companies of Bluepeak along with the principals exercising management control of Bluepeak.

Updated 3.2026

EXHIBIT A

Affiliates / Subsidiaries / Parent Entities

This Robocall Mitigation Plan is applicable to the following service provider entity subsidiaries of GI DI Rushmore TopCo, LLC ("Voice Service Providers"):

- Clarity Telecom, LLC d/b/a Bluepeak
- Bluepeak ABS Asset Entity I, LLC
- Bluepeak BTS Borrower, LLC

The business address for each Voice Service Provider is:

4600 S Ulster St., Ste 1300
Denver, CO 80237

Ultimate Parent Company:

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

GI DI Rushmore Holdings, LP
188 The Embarcadero
Suite 700
San Francisco, CA 94105

Principals Exercising Management or Control:

The principals exercising management or control for each Voice Service Provider are:

- Rich Fish, Julie Smoots

Parents, Affiliates and Subsidiaries:

The following entities are the parents, affiliates and subsidiaries of the Voice Service Providers:¹

- Bluepeak ABS Asset Entity I, LLC
- Bluepeak BTS Borrower, LLC
- Bluepeak BTS Guarantor, LLC
- Bluepeak ABS Guarantor, LLC
- Bluepeak ABS Issuer, LLC
- Clarity Telecom Holdings, LLC
- Clarity Telecom, LLC d/b/a Bluepeak
- GI DI Rushmore TopCo, LLC
- GI DI Rushmore Parent LP
- GI DI Rushmore Holdings, LP
- Python Intermediate I, LLC
- Python Intermediate II, LLC

¹ While each Voice Service Provider is listed, each such entity is listed only as an affiliate to the other Voice Service Providers.