

Robocall Mitigation Plan

LoKT Client is a small voice service provider (VSP) dedicated to stopping illegal calls from originating in our network and monitoring the calls coming into our network. The FCC requires that all VSPs certify in the Robocall Mitigation Database that they have (1) fully implemented STIR/SHAKEN across its entire network, (2) implemented STIR/SHAKEN on a portion of its network and that the remained of the calls are subject to a Robocall Mitigation Plan (RMP), or (3) have not implemented STIR/SHAKEN but subject all calls to an RMP to ensure that the network is not originating illegal robocalls. This filing updates LoKT Client's robocall mitigation efforts and procedures per FCC DA 24-73 and in compliance with 47 CFR § 64.6305.

The FCC requires that VSPs develop an RMP that:

- Lists the specific, reasonable steps the VSP has taken to avoid originating illegal robocall traffic
- States a commitment to respond fully and in a timely manner to all traceback requests from the FCC, law enforcement, and the industry traceback consortium
- To cooperate with entities investigating and stopping any illegal robocallers that use its services to originate calls

LoKT Client purchases origination, termination, and hosted-switch access from Clearly IP, Inc (FRN 0030209019) ("Provider") who provides crucial elements of our RMP as part of their interconnected white-label VoIP wholesale services to LoKT Client. All the voice traffic that originates on our network is subject to the robocall mitigation program described below subject to technical revisions implemented by Provider. LoKT Client does not have a parent company, nor any other entities controlling the company's operations.

Know Your Customer

We follow 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>).

International Subscribers

LoKT Client does not sell origination or termination services to subscribers outside of the United States.

Acceptable Use Policy

LoKT Client maintains an Acceptable Use Policy ("AUP") that subscribers must accept before being permitted to use LoKT Client's broadband or voice services.

Traceback Requests

LoKT Client is committed to respond in a complete and timely manner to all traceback requests from the Federal Communications Commission, law enforcement, state attorneys general, Provider, and the industry traceback consortium. Furthermore, LoKT Client is committed to cooperating with such entities in investigating and stopping any illegal robocallers that use LoKT Client's service to originate calls. Subscribers are required to comply with traceback requests via our AUP. Traceback requests can be sent to support@hilltownnetworks.com for immediate processing by LoKT Client.

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 LoKT Client or our Provider, then TN validation is necessary by requiring the subscriber to provide a valid letter of authorization that they are an authorized user of such TN. Should the subscriber provide sufficient documentation to LoKT Client of authorization to use a TN, documentation will be provided to Provider so that they can attest calls originated with these TNs.

Investigation of High-Volume Network Traffic, Suspicious Calls, and Calling Patterns

Consistent with industry standards and best practices, our Provider monitors our origination voice traffic in real-time to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts Provider if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. Provider will immediately ask LoKT Client to investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If LoKT Client or Provider determines that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as based on our AUP.

Examples of calling patterns monitored

- Higher than expected cost generated by calls from a subscriber
- Targeted pumping of repeated calls to a specific called number within a 15-minute period
- Fast traffic pumping of repeated calls to a specific called geographic location within a 5-minute period
- Slow traffic pumping of repeated calls to a specific called geographic location within a 60-minute period
- Theft of service traffic pumping of repeated calls to high-cost geographic location within a 60-minute period
- Recent call volumes (last 60 min) vs weekly trends
- Number of unique destination numbers in a 60-minute time frame
- Irregularities in Short Call Duration (SDC) and Average Call Duration (ACD) distribution
- Anomalies in Answer-Seizure Ratio (ASR)
- Robocalling triggers monitoring for a high-volume of outbound calls or excessive incoming calls from the same calling number
- Wangiri trigger monitoring for origination calls to high termination rate destinations with short duration (to trigger end-users to call back) for all calls over a 5-minute duration
- Analysis of recent and past Call Detail Records (CDRs) to benchmark against expected trends

STIR/SHAKEN Implementation

Provider has acknowledged to LoKT Client that it is currently authenticating and verifying with STIR/SHAKEN voice traffic that originates and terminates on our network.