

Robocall Mitigation Certification and Plan

Foursight Communications LLC dba Trilight Mobile ("Trilight" or "the Company") submits this robocall mitigation certification and attached Robocall Mitigation Plan pursuant to section 64.6305 of the Federal Communications Commission's ("FCC's" or "Commission's") rules.

STIR/SHAKEN Implementation

The Company is a voice service provider without a STIR/SHAKEN obligation serving end-users. The Company is a MVNO, reselling wireless voice services and does not have the facilities necessary to implement STIR/SHAKEN. Cellco Partners ("Verizon") and AT&T Mobility Services LLC ("AT&T") are the Company's underlying voice service providers. Verizon and AT&T have certified in the Robocall Mitigation Database that they have implemented the STIR/SHAKEN framework.

The Company relies on procedures, policies, and safeguards implemented by its underlying voice service providers to ensure that the Company's residential and business customers are sufficiently protected against robocall and spoofing activities.

ENFORCEMENT

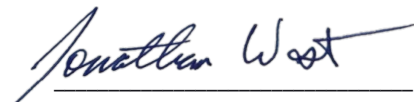
All voice traffic that originates on our network is subject to the attached Robocall Mitigation Plan.

The Company and/or any entity for which the filing entity shares common ownership, management, directors, or control have never been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program.

The Company has not been prohibited by the Commission from filing in the Robocall Mitigation Database.

I, Jonathan West, President of Trilight, submit this certification on behalf of the Company, which has implemented the STIR/SHAKEN authentication framework as indicated in the Robocall Mitigation Database. Identifying information relevant to Trilight is included in the attached Appendix.

Pursuant to section 1.16 of the FCC's rules, I certify, under penalty of perjury, that the information and statements contained herein are true and correct to the best of my knowledge and belief.



April 8, 2026

Robocall Mitigation Plan

Trilight has taken specific reasonable steps, as set forth below, to avoid originating and processing illegal robocall traffic.

The Company relies on the procedures, policies, and safeguards implemented by its underlying voice service providers to ensure that our voice service customers are sufficiently protected against robocall and spoofing activities.

The Company has not received information suggesting that robocalls are likely to originate on our network. Therefore, we do not consider our network at high risk of originating illegal robocalls.

Call Analytics

The Company relies on the call analytics of its underlying voice providers to monitor call traffic and does not utilize any other third-party analytics.

In its Robocall Mitigation plan, Verizon states that it adheres to Anti-Robocall Principles published by the state attorneys general. Verizon also states, “has heightened procedures to monitor outbound traffic in order to identify potentially illegal robocalls and take action when we do. That monitoring includes automatically generating reports that include metrics such as call volumes, SIP response codes, answer rates, call duration, honeypot hits, Industry Traceback Group traceback volumes, “neighbor” spoofing calling patterns, and calls that trigger crowd-sourced complaints.”

In its Robocall Mitigation filing, AT&T states, that it has a robust robocall monitoring program to identify and block illegal robocalls on its network; it leverages a broad set of data from internal proprietary as well as public sources; and “[c]entral to the detection of illegal robocalls” on its network is the aggregation of data, including “average call duration, call completion rates, calling identification name, call volumes and the timeframes in which calls are placed, sequential dialing patterns, complaint data ... and call volumes to telephone numbers on the Federal Trade Commission’s Do Not Call List.”

Know-Your-Upstream Provider Processes

The Company relies on the know-your-upstream provider processes of its underlying voice service providers. Additionally, the Company has verified that the underlying voice service providers have registered in the Robocall Mitigation Database.

Know-Your-Customer Processes

The Company 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>

Our retail voice customers live in or near the geographic service area in which we offer voice service. The vast majority of our voice end-user customers are residential or minimum line business accounts. These customers are limited to one call path, thereby minimizing the overall risk of robocalls originating from our customers.

The Company performs reasonable due diligence to ensure new accounts are activated by authentic customers.

For residential customers, the Company collects personal information including full name, address, phone number(s), email address, and payment information. Our customer data systems verify the accuracy of address information provided by customers. The Company validates customers’ email and payment information as part of delivering services to customers.

For business customers, multi-line business accounts are only initiated with proper contract information. The Company confirms:

- Contact Person's name, and phone number,
- Physical business location,
- Federal Tax ID (for tax-exempt entities)
- Home state registration, and
- Nature of Business.

The Company will take action on any sign of fraud or heavy calling patterns, including blocking voice service. Our Terms and Conditions prohibit unlawful, fraudulent, or harmful use of our network/services. To the extent that a customer or someone else violates our Terms and Conditions, service may be cancelled, disabled, or discontinued.

In their Robocall Mitigation Database filings, both Verizon and AT&T state that they have implemented know-your-customer processes. Verizon states that its robocall mitigation program adheres to the Anti-Robocall Principles published by the state attorneys general and it follows procedures for ensuring it knows the identities of its customers, especially ones whose service permits them to engage in high volume calling campaigns. AT&T indicates that it takes reasonable steps to know the identity of its direct retail and wholesale customers and it vets the identity of its postpaid and business subscribers as part of the service initiation process.

TRACEBACK

The Company commits to cooperate with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any robocallers that use our service to originate unlawful robocalls. Verizon states that it "is committed to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls." In its Robocall Mitigation Database filing, AT&T states its commitment "to respond to applicable traceback requests within 24 business hours as defined by the Commission when it is acting as the voice service provider, gateway provider, or non-gateway intermediate provider."

Appendix

Identifying And Other Information

- Primary address of the provider: PO Box 2748, 334 South Jefferson Avenue, Cookeville, TN 38501
- Other business names in use by the provider: Trilight Mobile
- Business names previously used by the provider: N/A
- Trilight Mobile is not a foreign voice service provider.
- OCN: None.
- Person within the company responsible for addressing robocall mitigation-related issues: Jonathan West, President, PO Box 2748, 334 South Jefferson Avenue, Cookeville, TN 14; jwest@trilight.net (P) 931-405-3217

- Principals, Affiliates, Subsidiaries, and Parent Companies

Officers of Foursight Communications, LLC dba Trilight

Jonathan West, President

Mark Patterson, Trilight Vice-President

Karen Jackson-Furman

Principals of Parent Companies

Jonathan West, Chief Executive Officer/General Manager; Twin Lakes Communications

Mark Patterson, General Manager, Highland Communications, LLC

Johnny McClanahan, President/Chief Executive Officer, North Central Communications, Inc.

Karen Jackson-Furman, Chief Executive Officer, West Kentucky Rural Telephone Cooperative Corp., Inc.

Charlie Boring, General Manager, Bledsoe Telephone Cooperative Corporation

Kasey Krueger, Chief Executive Officer, Advantage Cellular Systems, Inc., dba DTC Communications

Greg Smartt, General Manager/Chief Executive Officer, Ben Lomand Rural Telephone Cooperative, Inc.