

MEREO 89, LLC., DBA MEREO FIBER ROBOCALL MITIGATION PLAN

Pursuant to 47 C.F.R. § 64.6305, Mereo 89, LLC. dba Mereo Fiber) (“Mereo Fiber”, “the Company”) submits this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls.

This report describes the practices and procedures which Mereo Fiber has in place to protect its business customers and to mitigate illegal robocalls. Mereo Fiber may modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time in order to respond to changes in its business, its capabilities and its needs.

Mereo Fiber has not been prohibited from filing in the Robocall Mitigation Database pursuant to a law enforcement action, and none of its prior certifications have been removed from the Database by the Commission.

Mereo Fiber has not been, at any time in the prior two years, the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with the Company’s findings of actual or suspected wrongdoing due to it transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

Mereo Fiber is a Managed Service Provider “MSP”) and Mereo Fiber is focused on supporting businesses. As an MSP the Company provides multiple IT products and services to its business customers along with adjunct telecommunications products and services.

The Company is fully reliant upon its underlying carriers who provision the platform and services which the Company resells in order to support its business customers with telecommunications products and services. The Company is a switchless reseller.

Mereo Fiber Communications, Inc. is registered with the Federal Communications Commission (“FCC”) and holds the 499 Filer ID number of **835152**. The Company’s FRN/CORESID Number is 0032164865.

THE COMPANY PRIMARY PLACE OF BUSINESS

Address: 515 E Grant St, Suite 105
City, State, Zip: Phoenix, AZ, 85004
Phone: (801) 478-7200
Website: mereofiber.com
General Email: information@mereofiber.com

LEADERS OF THE COMPANY ARE:

CEO

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Address: 515 E Grant St, Suite 105

City, State, Zip: Phoenix, AZ, 85004

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COO

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DESIGNATED RMD CONTACT

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STIRSHAKEN COMPLIANCE

Through its underling carriers the Company is fully compliant as a switchless reseller. As a switchless reseller Mereo Fiber does not own its own network or infrastructure of any kind and therefore has no access to any IP portion of any call, or a SIP header of any call.

ROBOCALL MITIGATION PLAN

This Robocall Mitigation Plan describes the specific measures that the Mereo Fiber has implemented to detect and prevent illegal robocalls on its network as of June 30, 2023. Mereo Fiber will periodically evaluate the risks it faces, the effectiveness of its policies and procedures, and its capabilities to support the measures described. Should Mereo Fiber determine that changes are appropriate, its practices may differ from those described below.

Risk Assessment. Mereo Fiber is a switchless reseller that offers calling products by use of an undelying platform provider who owns the infrastructure to support VoIP calling. The Company resells these services to business and residential customers. The Company's customers do not typically originate high volume short duration ("HVSD") calls and Mereo Fiber has not received information suggesting that robocalls are originated by any of its customers. Therefore, Mereo Fiber leadership does not consider the Company at high risk of originating illegal robocalls.

KNOW YOUR CUSTOMER

Mereo Fiber maintains a Know Your Customer ("KYC") policy governing the customers to which it provides and resells services. Its customer relationships fall into two categories, and Mereo Fiber applies verification procedures appropriate to each.

Categories of Customer

Property customers. Mereo Fiber contracts with the owners of multi-family residential properties, with third-party property management companies acting under written authority from those owners, and with developers of multi-family properties that are under construction or in lease-up. These agreements govern the construction, ownership, and operation of network facilities at the property, Mereo Fiber's access and rights of entry, and any services Mereo Fiber provides to the property itself.

Resident customers. At properties where Mereo Fiber has constructed facilities under such an agreement, Mereo Fiber may offer voice service to residents of the property on an opt-in basis. A resident who elects service contracts directly with Mereo Fiber for service to that resident's unit.

Mereo Fiber does not sell service to carriers, resellers, or wholesale or transit customers. Mereo Fiber does not solicit or accept orders from the general public at large: a resident order can be placed only for a unit located within a property that Mereo Fiber already serves under an executed property agreement. Mereo Fiber's serviceable footprint is therefore a closed, known list of buildings, each of which has been individually surveyed, permitted, and constructed, and each of which is tied to a property owner whose ownership Mereo Fiber has verified.

The defining feature of Mereo Fiber's KYC process follows from this structure. For property customers, verifying the customer means verifying that the contracting party owns, or is authorized by the owner of, the real property to be served. For resident customers, verifying the customer means verifying that the subscriber occupies a specific unit within a property Mereo Fiber has already verified and built. In both cases, the customer is anchored to a fixed physical location that Mereo Fiber has independently confirmed.

Presales Diligence for Property Customers

Mereo Fiber conducts an in-depth presales process in which its representatives work directly with the prospective property customer to understand the specific characteristics of the property and of the customer's business. This process serves two purposes: to establish the identity and legitimacy of the counterparty, and to enable Mereo Fiber to engineer and deliver appropriate service to the property. Because service is delivered over facilities constructed to a fixed, identified address, the presales process necessarily involves site surveys, direct contact with on-site property personnel, and coordination with the party that controls access to the premises. These activities cannot be completed by a party without a genuine, demonstrable interest in the property.

Verification of Property Ownership

The central element of Mereo Fiber's KYC process for property customers is confirmation that the contracting party owns, or is duly authorized by the owner of, the property to be served. Prior to execution of an agreement, Mereo Fiber:

- Identifies the record owner of the service address through the recorded deed and the applicable county recorder, assessor, or property tax records;
- Confirms that the legal entity named in the agreement is the record owner of the property or is demonstrably affiliated with the record owner;
- Where a property management company or other agent executes the agreement, confirms that the agent holds written authority from the owner to contract for services at the property; and
- Where the property is under development and not yet placed in service, confirms the developer's ownership of, or recorded interest in, the underlying parcel.

Mereo Fiber does not execute a property agreement, construct facilities, or provision service where it cannot reconcile the contracting party to the record owner of the property.

Verification of Business Identity

In addition to ownership verification, Mereo Fiber verifies and records the following information for each property customer: legal business name; legal form of business (corporation, limited liability company, limited partnership, trust, or other); primary contact person; and physical service address.

Verification of Service Address

Mereo Fiber confirms the service address for every customer. Because Mereo Fiber's service is delivered over fixed facilities built to a specific building or community, the service address is independently corroborated in the ordinary course of business through site survey, permitting, construction, and installation activity, and must match the property identified in the ownership records described above. Resident service addresses are units within those same buildings and are drawn from the unit inventory established during construction.

Verification of Resident Customers

Because resident service is available only at properties Mereo Fiber already serves, the property-level verification described above is a precondition to every resident account. Mereo Fiber does not accept a resident order for an address outside its constructed footprint. When a resident elects service, Mereo Fiber:

- Confirms that the requested service address is a unit within a property Mereo Fiber serves under an executed and current property agreement;

- Records and verifies the resident's name, contact information, and specific unit; and
- Requires the resident to accept Mereo Fiber's service terms and Acceptable Use Policy as a condition of activation.

Service to a resident is delivered over dedicated facilities terminating in that resident's unit, and activation requires physical access to the premises. A resident account cannot be established, and service cannot be delivered, other than to a physical unit within a property Mereo Fiber has verified and built.

Measures to Prevent or Avoid Illegal Robocalls

- Mereo Fiber has in place an enforceable terms of use and/or an acceptable use policy. Mereo Fiber also has in place policies designed to detect and prevent fraudulent traffic on its network.
- Mereo Fiber uses analytics technologies and services provided by its upstream provider and third parties to monitor traffic on its network and identify potentially unlawful call origination activity. If Mereo Fiber has a reasonable basis to believe that a customer is originating illegal robocalls, it will require the customer to remedy the problem and, if effective action is not taken, Mereo Fiber can suspend and/or terminate service to the customer by the use of the underlying platform which is provided by the underlying carrier.
- Mereo Fiber has a protocol to work with the Company's upstream provider to block various types of calls by default by using the tools provided to the Company by the underlying provider who supports the platform.

TRACEBACK

Mereo Fiber is committed to cooperating with the Federal Communications Commission (FCC), law enforcement, and the industry traceback consortium in investigating and stopping any illegal robo-callers that it learns are using our service to originate calls or transit calls into the United States and territories.

The Company commits to fully responding within 24 hours to all traceback requests from the ITG, the TPTG, the FCC, and law enforcement. The Company shall cooperate with these groups to investigate and stop any illegal robo-callers from using the Company's service to carry or process illegal calls.

When notified by the FCC's Enforcement Bureau, Company shall block and report identified illegal traffic, and any substantially similar traffic, on an ongoing basis (unless Company's investigation determines that the traffic is not illegal) when Company receives actual written notice of such traffic from the Enforcement Bureau. If Company determines that the

identified traffic is not illegal, Company shall provide the Enforcement Bureau with an explanation as to why Company reasonably concluded that the identified traffic is not illegal, and what steps it took to reach that conclusion.

The Company utilizes a combination of tools provided by its underlying carriers and platform providers along with third-party solutions to check for Do Not Originate (DNO) numbers. In addition, the Company utilizes a combination of internal tools and third-party solutions to detect invalid phone number formats, area codes and unassigned number blocks. The Company also utilizes data analytics to detect and investigate irregular and unexpected calling patterns, originating number use against customer profiles.

UPSTREAM PROVIDERS

As a switchless reseller, Mereo Fiber uses the services and provisioned platforms from a number of upstream providers. The two key primary upstream providers listed below provide the platform to Mereo Fiber. As a switchless reseller, the Company does not own its own infrastructure. Further the Company is reliant upon its upstream provider for switching customer calls that originate on its platform. And the Company does not have access to the SIP header of any VoIP call.

1. GoTo

Address: 333 Summer Street, 5th Floor

City, State, Zip: Boston, MA,

02210

Phone: (833) 851-8340

Website: goto.com

General Email: info@goto.com

2. Bandwidth Inc

Address: 2230 Bandmate Way

City, State, Zip: Raleigh, NC

27607

Phone: (855) 864-7776

Website: bandwidth.com

General Email: contact@bandwidth.com

As stated the Company (as a switchless reseller) by leveraging its underlying platform provider. The company has the ability thought this platform and with the interaction of the

upstream provider, to reserve the right to refuse traffic from any party at any time where robocalling or use of originating numbers that are not valid.

The Company (as a switchless reseller) by its underlying platform provider is able to block the originating number(s), terminating numbers(s), trunk(s) or customer, including termination of customer relationship to prevent robocalling, invalid originating number or spoofed origination number transiting the Company's networks.

ONGOING ROBOCALL MITIGATION

Mereo Fiber monitors and examines call detail records (CDRs) on a repeating basis to detect suspicious call activity and/or calling patterns. When Mereo Fiber, or its underlying provider detects network usage patterns consistent with illegal robocalls or suspects illegal robocalling is taking place, Mereo Fiber will immediately seek to identify the party that is originating, terminating, or routing these calls and take appropriate action.

The actions taken may include, but are not limited to, initiating a traceback investigation; verifying that the originating customer owns or is authorized to use the Caller ID number; determining whether the Caller ID name sent to a receiving party matches the customer's corporate and/or d/b/a name; blocking the party's ability to originate, terminate, or route calls on the network; and/or providing notice to law enforcement authorities.

As part of Company plan to mitigate and prevent any originating robocalls, Mereo Fiber is committed to early identification and investigation of possible robocalling conditions. Among other things, with the tools and resources provided to the Company by its underlying carrier, Mereo Fiber watches for higher-than-normal subscriber traffic volume, including large bursts of traffic in small timeframes or spikes in usage. With the tools provided to the Company by its underlying provider, Mereo Fiber also monitors for originating calls classified as high volume short duration ("HVSD"), tracks for low call completion percentages, and/or originating calls with sequential called-to-number dialing patterns (of which as mentioned earlier in this plan has a history of being begnin).

COMPANY DECLARATION

The Company certifies that it has never been under investigation or committed any violations within the last two years with any local, state, or Federal agency or equivalent related to telemarketing or robocalling. Additionally, the Company is not currently subject to a formal action or investigation due to suspected unlawful robocalling or spoofing.

If when and as the Company business may change designated Company representatives only will update this RMP as appropriate.