

YORKSTREAM COMMUNICATIONS LLC ROBOCALL MITIGATION PLAN

All voice traffic that originates on Yorkstream Communications's network is subject to the following Robocall Mitigation Plan.

Call Analytics

Yorkstream Communications has implemented a proprietary system to provide robocall analytics on its network's outbound traffic. The system can identify patterns of suspected illegal robocalls based on call routing attributes and/or their status as suspected robocalls as reported to the Federal Communications Commission (FCC), Federal Trade Commission (FTC), or as reported by other carriers. Yorkstream Communications receives reports if any of its numbers experience a change in reputation such as suspicious traffic patterns or other detected anomalies outside the normal behavior of Yorkstream's traffic causing an alarm condition on that customer's account. Yorkstream Communications will examine the reports and investigate and identify the source of the calls as unlawful or legitimate.

Investigation

Yorkstream is committed to promptly investigate all calls identified as potential illegal robocalls or those that have anomalies consistent with known illegal robocalling patterns.

Additionally, if Yorkstream has any other reason to suspect illegal robocalling or unlawful spoofing is taking place over its network, Yorkstream will work internally to identify the party that is using its network to originate, route, or terminate such calls and take appropriate action consistent with its AUP.

Enforcement

Illegal robocalls and fraudulent spoofing is prohibited on the Yorkstream voice network. If it is determined a Yorkstream customer is using the network to fraudulently spoof calls or to originate illegal robocalls, Yorkstream will immediately cease the illegal traffic by terminating their service as allowed per Yorkstream Communications's policies.

Know your Customer (KYC)

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

Upstream Provider Knowledge

Yorkstream Communications identifies all partner carriers from which it receives traffic and confirms that all carriers are listed in the Robocall Mitigation Database before any traffic is allowed on the Yorkstream network. Yorkstream Communications has reviewed connected partner carrier's RMPs to verify how the partner monitors their originating traffic to mitigate illegal robocalls. In addition, Yorkstream Telecom has reasonable knowledge of partner carrier's network architecture through agreements between Yorkstream and its partners.

Role In the Call Chain

Yorkstream Communications is a voice service provider with a STIR/SHAKEN implementation obligation on its network.

Traceback

Yorkstream Communications commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to originate calls. Yorkstream Communications will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry

traceback consortium fully and in a timely manner and within twenty-four (24) hours upon the effective date of the Commission's timeline traceback rules.

Robocall Mitigation Database Eligibility

Yorkstream Communications has not been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling.

Yorkstream Communications has not been prohibited from filing in the Robocall Mitigation Database (RMD).

Customer Education

Yorkstream Communications provides education to customers on how to protect themselves from becoming a victim of unlawful robocalls.