LIVEWIRE TELECOM LLC ROBOCALL MITIGATION PLAN

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

Call Analytics

Livewire Telecom 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. Livewire Telecom 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 Livewire's traffic causing an alarm condition on that customers account. Livewire Telecom will examine the reports and investigate and identify the source of the calls as unlawful or legitimate.

Investigation

Livewire 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 Livewire has any other reason to suspect illegal robocalling or unlawful spoofing is taking place over its network, Livewire 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 Livewire voice network. If it is determined a Livewire customer is using the network to fraudulently spoof calls or to originate illegal robocalls, Livewire will immediately cease the illegal traffic by terminating their service as allowed per Livewire Telecom's policies.

Know your Customer (KYC)

Livewire Telecom has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Livewire Telecom 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

Livewire Telecom 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 Livewire network. Livewire Telecom has reviews connected partner carrier's RMPs to verify how the partner monitors their originating traffic to mitigate illegal robocalls. In addition, Livewire Telecom has reasonable knowledge of partner carrier's network architecture through agrements between Livewire and its partners.

Role In the Call Chain

Livewire Telecom is a voice service provider with a STIR/SHAKEN implementation obligation on its network.

Traceback

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

Livewire Telecom has not been prohibited from filing in the Robocall Mitigation Database (RMD).

Customer Education
Livewire Telecom provides education to customers on how to protect themselves from becoming a victim of unlawful robocalls.