

Conneaut Telephone Company dba GreatWave Communications

Acceptable Use Policy for Voice Robocall Mitigation

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Traceback Cooperation

GreatWave Communications will cooperate in traceback investigations. To allow for timely and comprehensive law enforcement efforts against illegal robocallers, GreatWave Communications will dedicate sufficient resources to provide prompt and complete responses to traceback requests from law enforcement and from USTelecom's Industry Traceback Group. GreatWave Communications has identified a single point of contact in charge of responding to these traceback requests and will respond to traceback requests as soon as possible, within 24 to 48 hours, excluding weekends and holidays.

- GreatWave Communications will require traceback cooperation. For all new and renegotiated service agreements governing the transport of voice calls, our web policy will specify the use of best efforts to require cooperation in traceback investigations by identifying the upstream provider from which the suspected illegal robocall entered its network or by identifying our own customer if the call originated in our network.

Subscriber Vetting Practices

- Residential and small business practices
 - GreatWave Communications will vet residential and small businesses through normal business practices and will obtain billing address, primary residence, or business location.
- Commercial retail end-users
 - GreatWave Communications will confirm the identity of commercial customers by collecting information such as physical business location, contact person(s), state or country of incorporation, federal tax ID, and the nature of the customer's business.
 - GreatWave Communications has call detail records to determine typical call volume and potential reasons for significant deviations from the typical call volume. GreatWave Communications will determine if there are legitimate reasons for any customer to be making a number of high volume, short duration calls. GreatWave Communications will contact any commercial business within 24 hours of such deviations to determine if call volumes are legitimate.
 - Wholesale Customers
 - GreatWave Communications will be responsible for the resale providers who lease voice services from GreatWave Communications. GreatWave Communications has call records and will closely monitor for significant deviations from the typical call volume of the reseller. GreatWave Communications will contact resale provider within 24 to 48 hours of such known deviations to determine if call volumes are legitimate. GreatWave Communications will rely on vetting practices of the resale provider, as resale provider is responsible to the end user voice customer. GreatWave Communications provides wholesale services to GreatWave Broadband Services.

Telephone Number Validation Practices

- Telephone Number Validation is necessary and appropriate when an End-User's right-to-use the telephone number is unknown to the VSP. GreatWave Communications will validate as necessary and appropriate.

International Practices

- GreatWave Communications will continue to monitor best practices and implement as needed.