



Robocall Mitigation Plan

Dragonfly Internet is dedicated to providing reliable, high-quality broadband internet and interconnected VoIP services to its customers. Dragonfly Internet offers these VoIP services on a resold basis, utilizing its wholesale VoIP provider, **Momentum Telecom, Inc.** (“Momentum”), a trusted provider of wholesale and retail VoIP and other communication services across the United States.

While Dragonfly Internet relies on the robust robocall mitigation policies, procedures, and safeguards instituted by Momentum, Dragonfly Internet has also implemented its own robocall mitigation plan to take additional measures in limiting the potential for the origination of unlawful robocalls by its customers.

Know-Your-Customer Policies

Subscriber Vetting

Dragonfly Internet verifies the identity of its customers during the application and contracting process for telephone service. As part of this vetting process, Dragonfly Internet collects the customer’s legal name, physical address, contact information, and, for commercial customers, federal Tax ID. Dragonfly Internet provides services to fixed locations using its own network, and installations are typically performed on-site by its personnel, enabling Dragonfly Internet to confirm the customer’s actual location. All this information allows Dragonfly Internet to validate the identity of potential customers before

provisioning service. If a customer’s identity cannot be verified, Dragonfly Internet will not provide service.

Service Terms

Customers who use Dragonfly Internet's telephone services for unlawful purposes, including originating unlawful robocalls, are subject to suspension or termination of service in accordance with Dragonfly Internet's terms of service.

Use of Call Analytics to Identify and Block Unlawful Traffic

Dragonfly Internet depends on Momentum's advanced call analytics systems to detect and block unlawful robocall traffic, as outlined in Momentum's robocall mitigation plan filed with the FCC.

Momentum's call analytics can identify robocall activity based on patterns such as:

- An unusually large number of calls originating from the same number.
- Excessive short-duration calls.
- Calls that terminate after a single ring.
- Calls to invalid, unallocated, or Industry Traceback Group (ITG) "Do Not Originate" (DNO) list numbers.

If Dragonfly Internet receives a report or alert from Momentum regarding suspected unlawful robocall traffic originated by a Dragonfly Internet customer, Dragonfly Internet will conduct an investigation. If the customer is found to have violated the terms of service, Dragonfly Internet will take appropriate action, which may include issuing a warning or terminating the customer's service without notice, depending on the severity of the violation.

Knowledge of Upstream Providers

Dragonfly Internet's upstream provider, Momentum, is a well-regarded and reputable wholesale service provider registered in the FCC's Robocall Mitigation Database. While Dragonfly Internet does not have direct knowledge of Momentum's upstream providers, it understands from Momentum's mitigation plan that their upstream connections are with service providers who have similarly represented to the FCC that they have effective policies and procedures for identifying and blocking unlawful robocall traffic.

Cooperation with the Industry Traceback Group (ITG), Law Enforcement, and Government Agencies

Dragonfly Internet is committed to responding fully and within 24 hours to all traceback requests made by the **Industry Traceback Group (ITG)**, law enforcement authorities, and government agencies to investigate and address suspected unlawful robocalls originating from its customers.

Dragonfly Internet will also cooperate fully with Momentum on traceback requests and comply with the FCC's robocall blocking requirements. Dragonfly Internet understands that Momentum will block all calls and provider traffic that:

1. Are identified in any public notice or order released by the FCC.
2. Are substantially similar to the types of traffic identified in any public notice or order released by the FCC.
3. Include a caller ID number or name on the ITG DNO list.

Contact Information

For questions or assistance regarding this Robocall Mitigation Plan, please contact Dragonfly Internet:

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