

Surry Communications

Reliable, And Locally Connected

Date: February 6 2026

Document Version Note: Updated to reflect FCC Robocall Mitigation Database annual recertification requirements effective 2026.

Subject: STIR/SHAKEN Implementation and Robocall Mitigation Plan

Company Information:

- **Company Name:** Surry Telephone Membership Corporation
- **DBA:** Surry Communications and Piedmont Communications
- **FCC Registration Numbers (FRNs):** 0001952605, 0010104388
- **Primary Contact Person:** Scott Mosley
- **Title:** Network Operations Manager
- **Phone Number:** 336-374-5021
- **Email Address:** mosleys@surrytel.com

Section 1: Introduction

Surry Telephone Membership Corporation is committed to combating illegal robocalls and ensuring the integrity of our telecommunications network. In accordance with FCC rules, we have implemented the STIR/SHAKEN framework and developed a comprehensive Robocall Mitigation Plan.

Section 2: STIR/SHAKEN Implementation

1. Overview:

Officers

Chris A. Younger, *President*
M. Joe Atkins, *Vice-President*
Ronnie Griggs, *Secretary / Treasurer*

Directors

Chad Bullington
Imogene (Jean) S. Hardy
Renee J. Martin
Joe Riddle

- Surry Telephone Membership Corporation has successfully implemented the STIR/SHAKEN framework across our IP-based voice networks.

2. Technical Implementation:

- Our network infrastructure supports the Secure Telephone Identity Revisited (STIR) and Signature-based Handling of Asserted Information Using Tokens (SHAKEN) protocols.
- All IP-based calls originating from our network are authenticated, and we validate IP-based incoming calls from other providers using the STIR/SHAKEN standards.

3. Certification:

- We have obtained the necessary certificates from the Policy Administrator (PA) and adhere to the governance provided by the Secure Telephone Identity Governance Authority (STI-GA).

4. Coverage:

- The STIR/SHAKEN framework is fully operational on the IP-based (VoIP) portion of our voice network.

Section 3: Robocall Mitigation Plan

1. Robocall Detection and Prevention:

- **Third-Party Vendors:**
 - Ribbon Communications
 - Innovative Systems
 - Cordell/NEX-Tech
- **Third-Party Vendor Systems:**
 - Ribbon Communications – C15 Call History Server and SWE Session Border Controller
 - Innovative Systems – APmax
 - Cordell/NEX-Tech – VQM Analytics Server
- We employ advanced analytics and machine learning algorithms to detect and block illegal robocalls. Surry Telephone Membership Corporation and its subsidiaries have partnered with Ribbon Communications, Innovative Systems, and Cordell/NEX-Tech to help mitigate robocalls and fraudulent calls.

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- By implementing Innovative Systems' Terminating Call Manager feature on our incoming TDM & SIP long-distance trunks, we have been able to block or challenge unwanted telemarketing calls and spoofed calls. This feature allows us to manually add known unwanted telemarketers' numbers, and it also auto-updates weekly from the FCC's known telemarketers list. All Surry Telephone Membership Corporation and its subsidiaries' customers have the option to add TCM to their individual lines to control their incoming calls.
- Cordell/Nex-Tech pulls daily reports from our Ribbon Call History Server. We receive reports on 911 calls, incoming and outgoing international calls, excessive calls, and repeat calls. These reports are emailed to us daily. If any alarming activity is detected, we take action by contacting customers to investigate. Decisions regarding further action are made after speaking with the customer. Actions based on these reports help Surry Telephone Membership Corporation and its subsidiaries control robocalls and fraudulent calls originating from our network.
- Our session border controller has been updated to comply with the STIR/SHAKEN authentication framework.
- All outbound VoIP calls are signed with our secure identity.
- All calls that originate and terminate on our network are subject to a robocall mitigation program.

2. Customer Education:

- We offer tools and applications that empower our customers to block unwanted calls.
- Our marketing team leverages social media and direct mailers to warn and inform our customers about potential unwanted robocalls.
- We are working to add STIR/SHAKEN and robocall mitigation information to our websites.

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3. Complaint Handling:

- Our dedicated team of customer service representatives (CSRs) is available to address customer complaints regarding illegal robocalls.
- All customer complaints about unwanted robocalls are directed to our Network Operations Manager.

4. Cooperation with Law Enforcement:

- Surry Telephone Membership Corporation cooperates fully with law enforcement agencies and industry partners to trace and mitigate illegal robocall sources.
- We promptly respond to traceback requests and provide relevant call data to authorized entities.

5. Affiliate and Subsidiary Compliance:

- Our subsidiaries are required to comply with the same robocall mitigation practices and procedures outlined in this plan.
- Our affiliates are responsible for implementing their own robocall mitigation practices and procedures.

6. Principal Information:

- **List of Principals:**
 - Richie C. Parker, Chief Executive Officer, parkerr@surrytel.com
 - Amy R. Hanson, Assistant Manager/Chief Operating Officer, hanson@surrytel.com
 - Scott Mosley, Network Operations Manager, mosleys@surrytel.com

7. Affiliates, Subsidiaries, and Parent Companies:

- **Affiliates:**
 - Visions West, LLC
 - Access On Networks
 - Carolina West Wireless, Inc
- **Subsidiaries:**
 - Piedmont Communications Services Inc.
- **Parent Company:**
 - Surry Telephone Membership Corporation

8. Knowledge of Our Customers:

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- ILEC customers are required to sign a membership agreement for service. This membership includes verbiage regarding compliance with the corporation's by-laws, which can be found on our websites. A valid North Carolina driver's license is required for service.
 - <https://ptmc.net/>
 - <https://surry.net/>
- Business CLEC customers are asked to provide their EIN for identity verification from an outside source.

9. Knowledge of Upstream Providers:

- Surry Telephone Membership Corporation and its subsidiaries know all carriers from which they receive and send traffic.
- Surry Telephone Membership Corporation and its subsidiaries have confirmed that connecting carriers are registered in the Robocall Mitigation Database.

10. Type of Extensions Received Under 47 C.F.R. §64.6304:

- Surry Telephone Membership Corporation operates a hybrid IP and non-IP (TDM) voice network. STIR/SHAKEN authentication is fully implemented on IP-based portions of the network. Certain non-IP (TDM) network elements are not capable of supporting STIR/SHAKEN authentication. The company maintains compliance with applicable FCC rules for non-IP networks under 47 C.F.R. §64.6304(d). As of January 2026, Surry Telephone Membership Corporation, along with its subsidiaries Surry Communications and Piedmont Communications, had a total of 15,298 access lines and estimated that 25% of our traffic is over TDM. Surry Telephone Membership Corporation and its subsidiaries are compliant with the June 30, 2023 deadline for STIR/SHAKEN implementation in our IP network.

11. Annual Robocall Mitigation Database (RMD) Recertification:

- Surry Telephone Membership Corporation completes annual recertification of its Robocall Mitigation Database (RMD) filing in accordance with 47 C.F.R. §64.6305(h). The company reviews its RMD filing annually to ensure all information remains accurate and current and submits required recertifications by the FCC-established deadline.
- The company updates its RMD filing within 10 business days of any material change, including but not limited to changes in ownership, principals, affiliates, contact information, network architecture, or robocall mitigation practices.