



## Robocall Mitigation Plan- UPDATED March 2026

Hardy Telecommunications, a non-profit cooperative headquartered in Lost River, W.Va., that offers voice, Internet and television service, is fully committed to utilizing its resources to prevent illegal robocalls from originating on its network. Hardy Telecommunications is a voice service provider with a STIR/SHAKEN implementation obligation serving end users. As of December 2025, Hardy Telecommunications had slightly more than 6,000 access lines. Our goal is to keep all Hardy customers from originating illegal robocalls and to protect our customers from receiving illegal robocalls as much as possible.

A significant portion of Hardy Telecommunications' voice call traffic still travels over TDM trunks to leave and enter our network through intermediate providers. As a provider with fewer than 100,000 access lines, Hardy Telecommunications received an extension from the TRACED Act requirements to implement STIR/SHAKEN until June 30, 2023. To that end, Hardy Telecommunications submitted its original robocall mitigation plan. In June 2023, Hardy Telecommunications submitted this updated robocall mitigation plan, which is designed to comply with the Federal Communications Commission's Seventh Report and Order (FCC 23-37). Now, Hardy Telecommunications submits this latest version, which mainly updates some minor misspellings and access line numbers. Hardy Telecommunications has now fully implemented STIR/SHAKEN and has additional robocall mitigation measures already in place. The company looks forward to working with the FCC, other industry groups and the Consortium to combat illegal robocalls.

As required by the Seventh Report and Order, Hardy Telecommunications commits that it will comply with the 24-hour traceback requirement and respond within the 24-hour period to any traceback request, according to the stipulations stated in the Order.

As required by the Sixth Report and Order, Hardy Telecommunications states that it has NOT, at any time in the prior two years, been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation concerning transmitting, encouraging, assisting or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

Also as required by the Sixth Report and Order, Hardy Telecommunications states that its OCNs are 0259 (covering 304-434 and 304-897 exchanges) and 8012 (covering 304-530 exchange).

The FCC's Fourth Report and Order in this matter listed three affirmative obligations for voice service providers: (1) Respond to traceback requests from the Commission, civil and criminal law enforcement, and US Telecom's Industry Traceback Group ("Consortium"); (2) Take steps to effectively mitigate illegal traffic when it receives actual written notice of such traffic from the Commission; and (3) Implement affirmative, effective measures to prevent new and renewing customers from using its network to originate illegal calls. The Sixth Report and Order expands the robocall mitigation requirements for all providers. Most notably, the extension for small providers to implement STIR/SHAKEN expired as of June 30, 2023, and Hardy Telecommunications now is fully compliant with STIR/SHAKEN as of April 2023.

***Implement STIR/SHAKEN on all IP portions of our voice network.***

Hardy Telecommunications has obtained a Service Provider Code token from the STIR/SHAKEN Secure Telephone Identity Policy Administrator (STI-PA), iconectiv, and is now authorized to obtain the required STIR/SHAKEN certificate. Hardy Telecommunications is listed on iconectiv's Authorized Provider list. Hardy Telecommunications has contracted with TransNexus to utilize its ClearIP service. TransNexus is listed on iconectiv's list of Approved Certification Authorities. All outbound Hardy IP and TDM voice traffic now routes through the ClearIP service to attach the required digital token to calls. All of Hardy's inbound IP and TDM voice traffic also routes through TransNexus. TransNexus, with ClearIP, is a prominent industry provider of services to make providers SHAKEN-compliant, and as such, it maintains current compliance with the latest regulatory updates and industry standards.

TransNexus and ClearIP offer a wide range of data analytics and call controls, including the ability to block calls. Hardy Telecommunications currently utilizes ClearIP's Inbound Shield and Reputation Lookup features, which are described in more detail later in this plan. Hardy Tel has the option to add various services as needed. Hardy will utilize the capabilities of its Meta softswitch and TransNexus ClearIP services as part of its robocall mitigation measures and respond accordingly when additional steps are needed.

***Respond to Traceback Requests from the Commission, Civil and Criminal Law Enforcement, and the Consortium.***

As the Commission states, traceback is an essential tool for determining the source of illegal robocalls. Hardy Telecommunications will respond fully and timely to all traceback requests from the groups listed above. To facilitate this response, Hardy Telecommunications will maintain a designated point or points of contact to handle traceback requests. As of this writing

of this plan, those points of contact are (1) Steve Poling, network and tech team manager; and (2) Bobby Armistead, outside plant and projects manager. Both may be reached at Hardy Telecommunications, 2255 Kimseys Run Road, Lost River, WV 26810; by calling 304-897-9911; or by email at [spoling@emp.hardynet.com](mailto:spoling@emp.hardynet.com) and [barmistead@emp.hardynet.com](mailto:barmistead@emp.hardynet.com). These points of contact and contact information will be updated as necessary.

In responding to traceback requests, Hardy Telecommunications will employ the tools at its disposal. Hardy uses a Metaswitch softswitch for its voice traffic. The Metaswitch allows us to see where a call entered our switch by originating from one of our customers or by transit from a specific trunk. We also can determine if the call terminated to one of our subscribers or exited on a specific trunk. In summary, we can gather information as to whether a call originated or terminated to a specific Hardy customer, and whether a call entered or exited our switch on a specific trunk and Trunk Circuit Identification Code assigned to another carrier. With the information we are able to obtain, we will cooperate and respond fully and timely to any traceback request from the Commission, civil and criminal law enforcement, and the Consortium. If the request comes from the Commission and/or law enforcement, we will ensure that any such requests are consistent with other legal and regulatory requirements.

***Take Steps to Effectively Mitigate Illegal Traffic when Notified by the Commission.***

Hardy Telecommunications is committed to mitigating illegal traffic on its network. As such, Hardy will take decisive action when notified by the Commission of suspected illegal calls. When Hardy receives notice from the Commission of suspected illegal calls, Hardy will promptly initiate an investigation into the traffic in question to determine, to the best of our ability, whether the traffic is in fact illegal robocalls, and to respond to the Enforcement Bureau with the results of that investigation. The investigation will involve researching and identifying the source of the traffic in question on Hardy's network and the origin of that traffic.

If our investigation – utilizing call logs, Metaswitch call history and customer inquiries as necessary – determines that the traffic is not illegal, Hardy will provide to the Commission an explanation as to why we concluded the identified calls were not illegal and what steps we took to reach that conclusion. Reasons for such a conclusion may vary but might include, for example, verifying that the robocalls were for a legally permitted purpose or that the customer had written consent from the called parties to send such calls. If a Hardy customer claims that its traffic is legal when that traffic has been flagged by the Commission, Hardy will require documented proof of prior express written consent from any called parties. Hardy will refer any callers who believe they have been blocked in error to the Commission for review.

If our investigation determines that the traffic is suspect or, indeed, illegal, Hardy will take steps to mitigate that traffic according to the origin of the traffic on Hardy's network. For example, if

we are notified about suspect traffic and we determine that the traffic in question entered our network not from a Hardy customer but from an upstream provider, we will inform the Commission of the source of the traffic and contact the upstream provider directly to inform them of the suspect traffic. Hardy will notify the upstream provider that Hardy, in accordance with applicable law, will to the best of its ability prevent illegal traffic from entering its network, including blocking calls from problem upstream providers identified as a source of illegal robocalls. In the event that a problem upstream provider continues to send illegal robocalls to Hardy's network, Hardy will block that problem provider's traffic until that provider ceases to send illegal robocalls.

If Hardy determines that the illegal traffic originated from a Hardy customer, Hardy will immediately notify and inform that customer and take steps to prevent the customer from originating illegal robocalls. This can include a variety of mitigating actions, including implementing mandatory account codes for outdialing; barring calls to local numbers, national numbers, international numbers, or any combination of the three; blocking outgoing calls, incoming calls, or both; and/or severing Hardy's relationship with that customer if no other action solves the problem.

### ***Implement Effective Measures to Prevent New and Renewing Customers from Originating Illegal Calls***

Hardy Telecommunications believes that the best way to stop illegal robocalls is to prevent them from originating on our network. One of the biggest frustrations in the pervasiveness of illegal robocalls is caller ID spoofing. It is important to remember that some robocalls are legal, and Hardy wants to ensure to the extent possible that its customers who originate legal robocalls are not blocked. Caller ID spoofing often differentiates a legal robocall from an illegal robocall. Illegal robocallers like to spoof their numbers to prevent their victims from knowing the actual source of the call.

Hardy already has measures in place to prevent caller ID spoofing on our network. Through our Meta softswitch, we only allow a customer to originate calls from a number that identifies in our switch as a number that has been assigned to that customer. This prevents a Hardy customer from originating calls with a spoofed caller ID number. When our Meta softswitch determines that a Hardy customer is attempting to originate a call from a number not assigned to that customer, our switch will not allow the call to go through. We feel that this is a decisive and the best protective measure that a voice service provider can implement to prevent illegal robocalls while allowing legal robocalls.

Through ClearIP with TransNexus, Hardy Telecommunications uses the Inbound Shield and Reputation Lookup features to monitor all outbound IP voice traffic in real time to prevent the

origination or transit of illegal robocalls. The software provides detailed reporting to identify suspected illegal robocalls. The system alerts us if we process outbound calls where the calling number has a poor reputation or is invalid, unallocated, on a Do Not Originate list, or in the FCC consumer complaint database. Hardy Telecommunications can then determine what action is taken regarding how to handle calls with a reputation score higher than the configured threshold.

Hardy Telecommunications is a small service provider with slightly more than 6,000 access lines. Our service territory is limited to a few counties in the Potomac Highlands region of West Virginia. As such, we are familiar with our customers and have a designated Business Representative that handles our relationship with business customers who, if any, are high-volume originators of calls. Hardy also maintains call logs and tracks on a regular basis the number and length of calls traveling over its SIP and TDM trunks, including creating and reviewing a "Top 10" list of customers each month originating the most calls. If Hardy discovers through a review of call logs or traceback of behaviors that any customer is exhibiting unusual calling behavior in originating excessive calls, or Hardy receives a complaint about a Hardy customer originating excessive calls, Hardy will contact that customer to determine whether any suspected illegal robocalling is taking place. Hardy will then take mitigating steps as necessary and as described above.

Any special requirements for Hardy customer call traffic that are determined to be lawful uses will be documented and handled on a case-by-case basis. If necessary, special contracts will be established clarifying the proper uses of call origination services, and service will be terminated for abuses.

### ***Technological Advances and Upgrades for STIR/SHAKEN***

Hardy Telecommunications will continue to monitor the industry for any technological advancements or upgrades in the implementation of STIR/SHAKEN, including suitable and FCC-supported TDM solutions for STIR/SHAKEN. TransNexus also promotes solutions for TDM traffic, such as Out-of-Band SHAKEN. As of late February 2026, all Hardy voice traffic, both IP and TDM inbound and outbound, passes through TransNexus. Hardy Telecommunications, through its relationship with TransNexus, will implement additional such measures as necessary. Hardy Telecommunications also will continue to evaluate its own network and those of our upstream carriers for the feasibility of implementing a full SIP network for our call traffic. Hardy is committed to protecting our customers from illegal robocalls by utilizing the most effective resources available that are compatible with our network and are financially reasonable for the fiscal health of the cooperative.

### ***Other Robocall Mitigation Methods for Customers***

Hardy Telecommunications uses Inteliquent, a Sinch company, for our CNAM database services. As part of that service, data analytics are used to determine suspected spam or similar calls. This information is displayed in the Caller ID identification of a call, so Hardy customers can see in their Caller ID whether a call is suspected spam. Similar services also are available through TransNexus if needed.

Hardy Telecommunications also employs other measures to help protect customers from unwanted robocalls. The company offers two calling features for free: Privacy Defender/Telemarketer Block and Anonymous Call Rejection. Privacy Defender/Telemarketer Block will require callers to press "8" to complete a call and will block calls that fail to comply. Anonymous Call Rejection routes incoming calls with Caller ID information marked as "Private" or "Non-Published" to an announcement which indicates the customer is not accepting private calls. We are happy to share details about our other mitigation measures if asked.

**Hardy Telecommunications Info pursuant to DA 21-454:**

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Hardy Telecommunications is not a foreign voice service provider.