



Molalla Communications

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RE: Molalla Communications Robocall Mitigation Plan

Molalla Communications has implemented the following steps to mitigate and avoid illegal robocall traffic originating from its voice network:

- Molalla Communications utilizes a full STIR/SHAKEN implementation via third party services.
 - Implementation of TNS Call Guardian Authentication Services
 - Call Guardian includes analytics to filter calls based on calling number reputation, carrier negative reputation and individual subscriber preferences
 - Digital Certificate registered with iConnectiv STI-PA
- System security measures have been implemented to prevent spoofed calls utilizing local TN information from being terminated on local network
- System security measures have been implemented to prevent transit traffic through our system and only allow local traffic to originate from the network
- Direct upstream providers are vetted before allowing traffic to terminate
- The identity of all subscribers is vetted via the application process, to include verification of name, physical address and government issued ID, in order to ensure valid use of telephone number resources.
- Caller ID information is verified and subscribers are not granted the right to send untrusted subscriber information.
- Subscribers are authenticated to Molalla Communications' network and unauthenticated use is prohibited via control and security mechanisms.
- Molalla Communications does not sell services to international call originators.
- Molalla Communications does not sell services to subscribers outside of its physical certificated service area.
- All Molalla Communications subscribers are required to have a physical connection to its network and all other connections are denied via security protocols.
- Molalla Communications will update RMD certification within 10 days of any changes.

Molalla Communications commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement and the industry traceback consortium and to cooperate with such entities in investigating and stopping illegal robocallers that use its service to originate, carry or process illegal robocalls.