

Kingdom Telephone Company ROBOCALL MITIGATION PLAN

Kingdom Telephone Company, Operating Company Number (1910), is eligible for the continuing extension of the STIR SHAKEN implementation deadline as a small voice service provider (§64.6304 (a)(2) that has non-IP portions within its network §64.6304(d).

Kingdom Telephone Company provides local service to fewer than 100,000 voice subscriber lines.

Kingdom Telephone Company also originates calls via SIP connections within its network. Kingdom Telephone Company has registered with the Policy Administrator and is an authorized service provider in the STIR|SHAKEN ecosystem. Kingdom Telephone Company has implemented STIR|SHAKEN within its IP-network and signs the calls originating on the IP portions of Kingdom Telephone Company's network.

To meet the non-IP network criteria for the continuing STIR SHAKEN extension (§ 64.6303 (a)(2)), the company is a member of NTCA. NTCA participates on the ATIS Non-IP taskforce working group which developed the (ATIS Solutions) non-IP call authentication solutions. NTCA is serving as the third-party representative on the ATIS Non-IP taskforce working group for both companies.

Kingdom Telephone Company is a Cooperative Voice and Broadband Provider. A Cooperative structure means that members own the company. Kingdom Telephone is the parent company and operates a subsidiary company: Kingdom Telecommunications, Inc., dba: Phynx Fiber outside the ILEC serving territory. Phynx Fiber offers facilities based fiber internet services and resells, VoiP phone services from a third-party company: Momentum.

Robocall Mitigation Plan

All voice traffic that originates on the network is subject to the following Robocall Mitigation Plan.

The following is an outline of steps deployed to combat the termination of illegal robocalls:

- Kingdom Telephone Company has a C15 switch utilizing enhanced APAX Terminating Call Manager (TCM) features which protect our customers from the robocall/telemarketer epidemic.
- Once per week an updated FCC Do Not Call list is automatically loaded into the APMAX where we can configure a global list from our subscriber's blocked lists.
- These numbers are then greeted with a blocked recording, effectively ending the call: "The number you have reached does not accept calls from Telemarketers. If you are a Telemarketer, please add this number to your Do Not Call list and hang up now. Otherwise, please press '1'." Since live telemarketing callers have to press "1" to

complete the call, automated dialers will merely timeout without ever ringing the subscriber's phone.

- Regular long distance callers will hear the announcement the first time they call, and then the service 'learns' that they are an accepted caller and will not challenge it again.
- Kingdom Telephone does not block calls to emergency services and makes sure customers understand they can opt out of call blocking. If they want call blocking, we make sure they understand that some valid calls might be blocked with the automated system.
- Customers have the control:
 - Do Not Disturb functions are available and can be turned on/off
 - Call Screening functions are available and can be turned on/off
 - Customers can manage their allowed/blocked lists The following is deployed to combat the origination of illegal robocalls:
- TCM can be configured to block Caller ID spoofing of local numbers that originate outside the local network.

Internal Traffic Monitoring & Investigation

Kingdom Telephone Company monitors our network for high-volume voice traffic to identify suspected robocall patterns. If any patterns are discovered, Kingdom will work to identify the party using our network to originate the calls and take appropriate action such as verifying that the originating customer is authorized to use the number (is a valid customer) or even terminating the subscriber's ability (per contract/service agreement terms) to originate illegal calls on our network and notifying law enforcement authorities, the FCC and the FTC.

Know Your Customer

Kingdom vets our new and re-newing customers. When the customers apply for service, Kingdom gathers contact information, date of birth, and social security numbers and run a credit check on these customers using Online Utility Exchange Service. This service can highlight, age, address, and name discrepancies with the social security number ran. If the customer applies in person, a photo id is requested to verify applicant's identity.

Enforcement

Kingdom require customers to acknowledge in the application for new service that it is illegal to spoof or falsify your caller ID for fraudulent purposes when using their assigned phone number and that it is also illegal to make unsolicited telemarketing or illicit calls.

Customer's found abusing service will be disconnected and reported to the FCC.

Upstream Provider Knowledge

Kingdom knows all the carriers from which it receives traffic.

Kingdom has confirmed that all its connected carriers are listed in the Robocall Mitigation Database.

Kingdom incorporates traceback and prohibited traffic language in all contractual agreements with carriers.

Kingdom has reviewed the connected carrier's RMPs to learn how the carriers monitor their originating traffic to mitigation illegal robocalls.

Role In the Call Chain

Kingdom is a voice service provider with a STIR/SHAKEN implementation obligation on the IP-Portions of its network and voice service providers without a STIR/SHAKEN obligation on the Non-IP portions of its network that relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

Traceback

Kingdom Telephone is a Broadband Provider committed to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to originate calls. Kingdom will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium fully and in a timely manner within twenty-four (24) hours.

Robocall Mitigation Database Eligibility

Kingdom has not been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling.

Kingdom has not been prohibited from filing in the Robocall Mitigation Database (RMD).

Company Information: