

Williard Telephone Cooperative Association Robocall Mitigation Plan

This Robocall Mitigation Plan describes the specific reasonable steps that Willard Telephone Cooperative Association (or “Company”) has taken to avoid the origination, carrying, or processing of illegal robocall traffic. Willard Telephone Cooperative Association provides voice services over a Voice over Internet Protocol (VoIP) platform that is hosted by Sinch.

Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Robocalls

Willard Telephone Cooperative Association has a “know-your-customer” policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. Although Willard Telephone Cooperative Association’s business customers generally do not generate a high volume of calls, were the Company to receive a request for high-volume origination services, it would exercise caution and extensively investigate such customers before granting access to the services. Specifically, we would collect information such as their physical business location, contact person(s), state or country of incorporation, federal tax ID, and the general nature of their business.

In addition, Willard Telephone Cooperative Association's Customer Terms and Conditions Agreement contains a provision that allows for service termination in the event services are abused by customers and the Company will not hesitate to enforce this policy if necessary.

“Know-Your-Upstream Provider” Procedures

Willard Telephone Cooperative Association relies upon the “Know-Your-Upstream Provider” procedures of Sinch, the company that hosts the VoIP platform through which Willard Telephone Cooperative Association provides voice service. Willard Telephone Cooperative Association is confident that Sinch exercises due diligence before accepting traffic from an upstream provider.

Use of Call Analytics Systems

Willard Telephone Cooperative Association receives a daily upload of call detail from its hosted VoIP platform provider, Sinch, into its local billing platform. An automated daily email notifies Willard Telephone Cooperative Association employees on call volume. If call volumes are normal, the report contains no information. If a call limit is reached (e.g. 250 calls per phone number), the relevant customer phone number(s) and number of calls are included in the report.

Willard Telephone Cooperative Association will review the analytics of traffic from phone numbers with a high volume of calls using call log data to see if anything appears peculiar. If there appears to be a legitimate reason for a customer's traffic spike (e.g. a natural disaster struck a nearby area that generated significant calling) then the investigation would be documented and closed.

If a customer's traffic spike generally matches a robocalling call pattern (e.g. short duration calls with low completion rates), then the customer would be presented with the call record details and asked for an explanation for the call volume.

- If the customer's explanation is viable and legitimate (e.g. customer was utilizing an outbound calling device to notify its customers of an upcoming outage; school district or business account call tree), then the case would be documented and closed.
- If the customer's explanation is questionable, then the customer would be reminded of Willard Telephone Cooperative Association's policy on illegal robocalling and advised that their account will be immediately terminated if another instance occurs without a fully justifiable explanation.
- If the customer is unwilling or unable to offer any reasonable explanation, then Willard Telephone Cooperative Association would investigate the calls further and terminate service if it is found that the customer used Willard Telephone Cooperative Association's service to make illegal robocalls.

In addition, Willard Telephone Cooperative Association customers can use a portal to block incoming phone numbers. Selective call acceptance is a feature customers have control over to allow or deny incoming calls. Hosted VoIP platform provider Sinch can also block unwanted voice and fax calls upon request from Willard Telephone Cooperative Association.

Commitment to Respond to Traceback Requests

Willard Telephone Cooperative Association 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 any illegal robocalls that use its services to originate, carry, or process illegal robocalls.