

Duo County Telephone Cooperative, Inc.
STIR/SHAKEN IMPLEMENTATION
ROBOCALL MITIGATION CERTIFICATION
ROBOCALL MITIGATION PLAN

Duo County Telephone Cooperative, Inc. (Duo or Company) submits this certification pursuant to section 64.6305(d) of the Federal Communications Commission's (FCC's or Commission's) rules.

Identifying and Other Information:

Primary address:

2150 North Main Street
P.O. Box 80
Jamestown, KY 42642

Other business names in use: DUO Broadband

All business names previously used: Duo Telecom

Principals, affiliates, subsidiaries, and parent companies: Duo is a cooperative corporation owned by its subscriber members in which no subscriber owns more than one percent interest.

Principal: Thomas E. Preston, Principal

Subsidiary: Cumberland Cellular, LLC

Duo is not a foreign voice service provider.

OCN: 0401

Individual responsible for addressing robocall mitigation-related issues:

Tristan Bonnstetter, Director of Regulatory and Government Affairs
Operations Department
2150 North Main Street, Jamestown, KY 42642
270-343-1197
tbonnstetter@duobroadband.com

Duo has implemented the STIR/SHAKEN authentication framework for all calls on the IP portion of its network.

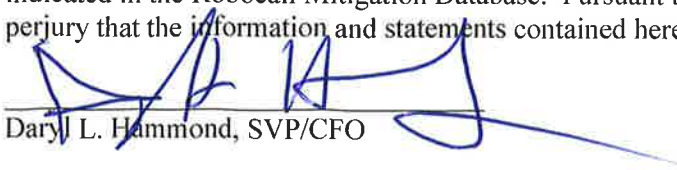
All calls that originate on Company's network are subject to the attached Robocall Mitigation Plan.

Duo has never been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program.

Duo has not been prohibited by the Commission from filing in the Robocall Mitigation Database.

Duo commits to cooperate with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any robocallers that use our service to originate unlawful robocalls. Duo will respond fully, within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium.

I, Daryl L. Hammond, Senior Vice President and Chief Financial Officer, for Duo County Telephone Cooperative, Inc., submit this certification on behalf of Duo, which has implemented the STIR/SHAKEN authentication framework as indicated in the Robocall Mitigation Database. Pursuant to section 1.16 of the FCC's rules, I certify, under penalty of perjury that the information and statements contained herein are true and correct to the best of my knowledge and belief.


Daryl L. Hammond, SVP/CFO

STIR/SHAKEN Implementation

Company's role in the call chain is a voice service provider with a STIR/SHAKEN implementation obligation on the IP-portion of its network and a voice service provider without a STIR/SHAKEN obligation on the non-IP portion of its network.

Duo has implemented the STIR/SHAKEN authentication framework on a portion of its network, and all calls it originates on that portion are compliant with section 64.6301(a)(1) and (2). Metaswitch provides call signing and verification for Duo.

For the non-IP portions of its network, Company is subject to a continuing extension as set forth in section 64.6304(d) of the Commission's rules, which is relevant to those "portions of a voice service provider's network that rely on technology that cannot initiate, maintain, and terminate SIP calls." Duo is a member of NTCA, which is actively participating in industry efforts to develop a non-IP solution to illegal robocalls.

Robocall Mitigation

Duo has taken specific reasonable steps to avoid carrying or processing illegal robocall traffic. Duo has retained Transaction Network Services (TNS) to implement call analytics to mitigate robocalls. TNS provides call blocking and filtering analytics from the TNS Call Guardian product to stop any callers suspected of illegal robocalling or spoofing over our network. The TNS product analyzes high-volume network traffic to identify and monitor patterns consistent with robocalls and provides real-time reports of suspicious activity.

Our Acceptable Use Policy prohibits utilizing our Duo services for deceptive purposes, engaging in fraudulent activities, and violating local, state, or federal laws.

Know-Your-Customer. Duo vets new and renewing customers. We will confirm the identity of new or renewing residential and business customers by collecting identifying information including, as applicable, SSN, date of birth, contact person for the business, physical address, state and/or country of incorporation, and federal tax ID. New customers requesting an excessive number of call paths will be screened for legitimate usage needs. New and existing customers with an excessive number of call paths will receive robocall outreach and education materials.

All residential and business customers are only able to place calls originating from their own phone number.

Caller ID and call records are reviewed when service is installed to verify legitimate caller ID information.

Know-Your-Upstream Provider. Duo knows all carriers from which it receives traffic. Duo has confirmed that all connected providers are listed in the Robocall Mitigation Database. Duo shares call authentication data with connected service providers.

Traceback. We will respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and will cooperate with such entities in investigating and stopping any robocallers that use our network to originate robocalls.

Duo reserves the right to modify and/or supplement its robocall mitigation plan to adapt to risks and to improve the overall effectiveness of its program.