



Gorham Telephone Company (GTC or the Company) (FRN 0004322889) has implemented a Robocall Mitigation Program, required by Section 4(b)(5)(C) of the TRACED Act, and 47 C.F.R. §64.6305, as documented herein. GTC has previously received the extension of the STIR/SHAKEN implementation deadline under §64.6304(d) of the FCC's rules for the non-IP portion of its network, but has now implemented STIR/SHAKEN in 100% of its network.

STIR/SHAKEN

All the voice traffic that originates on GTC's network is subject to the robocall mitigation program described below and is 100% STIR/SHAKEN compliant via its Tolly Digital switch and in partnership with ClearIP/TransNexus as the STI-Certificate Authority (STI-CA) service provider for GTC. Additionally, GTC's network will support call termination services for all customers where GTC is not originating the call but passing the call over its networks/partners via SIP and ensuring GTC or its partners maintain STIR/SHAKEN information in the SIP messaging. This is also part of all new customer verification and testing prior to implementing services.

Know Your Customer

GTC follows the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

GTC investigates new and renewing customers seeking access to high-volume origination services and, if necessary and possible, modifies service terms and conditions to mitigate the potential of any new or renewing customer originating illegal robocalls.

Robocall Mitigation

GTC uses a Tolly Digital switch and software provided by ClearIP/TransNexus to monitor all outbound voice traffic in real time to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts GTC if any calls are originated where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. GTC immediately investigates any identified calls to determine if the caller was attempting to originate unlawful robocalls. If GTC determines that the caller was attempting to originate unlawful robocalls, GTC either warns them to stop or terminate their service as appropriate.

Know Your Upstream Provider

GTC has implemented a "know your upstream provider" process that includes exercising due diligence prior to accepting traffic from such providers. This process includes, but is not limited to, collecting information from upstream providers such as physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of the upstream provider's business. If and when necessary, GTC will take additional steps, such as adopting contract terms and conditions that allow termination of the traffic exchange in the event the upstream provider attempts to use Mescalero's network to carry or process a high volume of illegal traffic.

Traceback

GTC responds to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and cooperate with such entities in investigating and stopping any illegal robocallers that use GTC's service to originate calls.