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Pigeon Telephone Robocall Mitigation Plan

Pigeon Telephone qualifies for the following extension under 47 CFR 64.6304, d. Non-IP networks.

Pigeon Telephone has partially implemented STIR/SHAKEN on our network and is actively carrying out a robocall mitigation program using TNS' Call Guardian Authentication Hub.

Reasonable steps taken to avoid originating illegal robocall traffic:

- Contracting with Transaction Network Services (TNS) for their Call Guardian Authentication Hub (CGAH) product that provides STIR/SHAKEN services and provides access to their Data Analytics web portal to proactively monitor for illegal traffic on our network. Also blocking incoming low reputation score calls and subscribing to TNS' DNO list service.
- Commit to respond to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.
- Vetting our residential and business customers to ensure that use of our numbering resources is valid and legal.
- Encourage our customers to use the Do Not Call Registry and to educate them about robocalling and how to avoid scams and fraud.
- Establishing a single Point of Contact (along with backups) for our robocall mitigation program.
- Pigeon Telephone Company currently only accepts traffic from one upstream provider: AT&T. Traffic with AT&T is over leased TDM trunks, is two-way, and has been in place for years. Pigeon Telephone does not operate as a tandem provider.
- Affirmative measures taken to prevent customers from originating illegal robocalls: bills are reviewed for high usage and excessive charges and are investigated immediately; new and renewing subscribers are required to provide two forms of ID, one with a photo, and are subject to a credit check.
- Customers are subject to restrictions contained in the Acceptable Use Policy. Its existing Acceptable Use Policy prohibits activities associated with Robocalling including, but not limited to: engaging in communication falling outside the normal range of use; initiating unsolicited telemarketing calls, or any form of "robocall"; transmitting misleading or inaccurate caller ID information with the intent to defraud, cause harm, or wrongfully obtain anything of value; and engaging any illegal activity. The Acceptable Use Policy also prohibits fraudulent activities. In the Acceptable Use Policy, customers are notified that Pigeon Telephone may take action up to suspension or termination of service for violation of the Acceptable Use Policy.

Regarding our place in the call chain, Pigeon Telephone Company is a voice service provider with a STIR/SHAKEN implementation obligation serving end-users on the IP-portions of its network.

We certify that Pigeon Telephone Company has not been prohibited from filing in the Robocall Mitigation Database pursuant to a law enforcement action.

Pigeon Telephone Company's OCN is 0721.