

## **Robocall Mitigation Plan Description Stoneham**

1. **Stoneham Cooperative Telephone Corporation.** Is a Small Service Provider, serving fewer than 100,000 voice service subscriber lines and therefore qualifies for an extension until June 30, 2023 of STIR SHAKEN Implementation under 47 C.F.R. §64.6304(a), which reads:

§64.6304 Extension of implementation deadline.

(a) Small voice service providers. (1) Small voice service providers are exempt from the requirements of §64.6301 through June 30, 2023.

(2) For purposes of this paragraph (a), "small voice service provider" means a provider that has 100,000 or fewer voice service subscriber lines (counting the total of all business and residential fixed subscriber lines and mobile phones and aggregated over all of the provider's affiliates).

2. **Stoneham Cooperative Telephone Corporation** commits to respond to all trace back requests from the Commission, law enforcement, and industry trace back consortium, and to cooperate with such entities in investigating and stopping any illegal robo callers that use its service to originate calls.
3. **Stoneham Cooperative Telephone Corporation** has taken the following specific steps to detect originating robocall traffic:
  - a. We vet our customers when they sign up for service to determine if they will be originating high call volumes, such as a call center, however at this time we currently do not serve any such customers.
4. **Stoneham Cooperative Telephone Corporation** has taken the following steps to prevent illegal originating robocalling traffic:
  - a. We do not have VOIP services. Willard has not received any illegal originating robocalling traffic as of right now. If this occurs, we will shut the customer down and report them to the authorities that need to be notified.
  - b. Willard uses a billing vendor called MACC that tracks our subscribers' activities. In the event of an unusual traffic origination that is detected, we will ask the customer for an explanation. If it is determined that they are originating illegal robocall traffic, we will terminate their service after multiple violations.

**5. Stoneham Cooperative Telephone Corporation** has taken the following steps to mitigate illegal originating robocalling traffic upon detection:

a. Stoneham will turn in all parties that are caught in detection of illegal activity and multiple violations will result in service termination.