

# ROBOCALL MITIGATION PLAN MADISON TELEPHONE, LLC AND ITS AFFILIATED PROVIDERS

## TECHNICAL AND OPERATIONAL FOUNDATIONS OF MT NETWORK'S PLAN

MT Network's Robocall Mitigation Plan is premised upon a three-pronged set of technical and operational procedures, the details of which can be summarized as follows:

1. **Prevention:** MT Networks utilizes a stringent onboard screening process designed to prevent those who may engage in illegal robocalling from becoming MT Networks customers at the outset. After our initial "Know Your Customer" screening and customers are on-boarded, MT Networks works to stay closely aligned with its customers regarding the industry's anti-robocalling objectives by providing regular customer communications to remind, educate, and clarify what behaviors may signal or constitute unlawful robocalling and encourage them to take all necessary steps to prevent illegal robocalling behaviors on their networks. MT Networks is familiar with our customer base and engages with them on a day-to-day basis through installation, billing, and service support processes.
2. **Attestation:** MT Networks has secured a Stir Shaken Token and practices A-level attestation on the MT Networks calling network with our partners and local interconnections.

MT Networks **1)** - Is responsible for the origination of calls onto the network through the on net switching platform; **2)** Has a direct and authentic relationship with the customers through local offices and technicians; and **3)** Has an established verified association with originating telephone numbers used for calling through instances on the locally hosted switching platform.

3. **Detection:** MT Networks is a vendor of Bandwidth, Inc. as an upstream network service provider. This relationship allows MT Networks to leverage the Bandwidth team and toolbox. Their team of operational experts has implemented technical and operational processes and procedures to detect and analyze the use of its services and traffic on our network, which helps to determine when illegal and inappropriate robocalling activity may be occurring. When unlawful robocall campaigns are detected, Bandwidth works to stop the unlawful activity as quickly as possible. Bandwidth is also consistently augmenting its robocall detection technologies to improve our ability to rapidly detect and react to suspected robocall behaviors.
4. **Mitigation:** In order to prevent the delivery of unwanted and illegal traffic to the greatest degree possible, MT Networks leverages our trusted relationship with Bandwidth to manage its STIR/SHAKEN features as well as call-blocking tools that are designed to block calls from invalid and illegal telephone numbers in keeping with industry best practices and the FCC's recommendations. As an industry leader, Bandwidth also continues to work to enhance its mitigation capabilities through the widespread adoption of STIR/SHAKEN together with critical IP traffic exchange capabilities across the industry. Bandwidth also works closely with Law Enforcement Agencies (LEA) at all levels of government and with its interconnected carrier partners. Relatedly, Bandwidth's fraud and security experts are constantly working to respond to complaints and events, like the ITG, AG, and LEA subpoenas that include analyzing our network traffic and initiating trouble tickets with Bandwidth customers like MT Networks that may be associated with unlawful behaviors at the source of such consumer complaints. In addition to these notifications, we then aim to work diligently together with our customers and other industry members to stop unlawful robocall campaigns detected by Bandwidth and their partners.

5. **Diligence:** MT Networks understands the critical infrastructure that both inbound and outbound wireless and wireline services provide. With that in mind, MT Networks utilizes the [freecallerregistry.com](http://freecallerregistry.com) resource to ensure a high quality of service, along with partners such as Transaction Network Services (TNS) for any issues with legitimate outbound calling issues. Additionally, call traceback capability is available within the MT Networks calling network within 24 hours of call placement. \* MT Networks does not track call analytics.

#### **AFFILIATED ENTITIES COVERED BY MADISON TELEPHONE'S ROBOCALLING MITIGATION PLAN**

Madison Telephone, LLC is a Kansas Incumbent Local Exchange Carrier (ILEC) authorized to serve parts of northern Greenwood County, KS, and a small southern part of Lyon County, KS. Madison Telephone, LLC has been assigned the FRN – 0004322079. Madison Telephone, LLC has been assigned OCN - 1801.

Madison Telephone, LLC began a Kansas Competitive Local Exchange Carrier (CLEC) in 2015 known as MT Networks, LLC. MT Networks, LLC is a 100% owned subsidiary of Madison Telephone, LLC, and operates in Coffey County, KS. Therefore, MT Networks, LLC is explicitly incorporated into Madison Telephone's plan. MT Networks, LLC has been assigned the FRN – 0023883499. MT Networks, LLC has been assigned OCN – 447H.

Madison Telephone, LLC and its 100% owned subsidiary, MT Networks, LLC are owned by the DeWitt / Stutesman family. The ownership structure is as follows:

- Diantha C. Stutesman – 49% owner (Class B shares)
- Nathan DeWitt – 49% owner (Class B shares)
- Sherry DeWitt – 1% owner (Class A shares)
- Larry DeWitt – 1% owner (Class A shares)