

HART TELEPHONE COMPANY ROBOCALL MITIGATION PLAN

Hart Telephone Company is eligible for the continuing extension of the STIR SHAKEN implementation deadline on Non-IP networks as a small voice service provider (§64.6304 (a)(2) that has non-IP portions within its network §64.6304(d). To meet the non-IP network criteria for the continuing STIR SHAKEN extension (§ 64.6303 (a)(2)), Hart Telephone Company is a member of NTCA. NTCA participates on the ATIS PTSC Non-IP Call Authentication Task Force working group which developed the (ATIS Solutions) non-IP call authentication solutions. NTCA is serving as Hart Telephone Company's third-party representative on the ATIS PTSC Non-IP Call Authentication Task Force working group.

Hart Telephone Company's network also has IP-portions which originates calls via SIP connections to other carriers. Hart Telephone Company has registered with the Policy Administrator and is an authorized service provider in the STIR|SHAKEN ecosystem. Hart Telephone Company has implemented STIR|SHAKEN within the IP portions of its network and signs the calls originating on the IP portions of its network with the Hart Telephone Company certificate.

All calls that originate on Hart Telephone Company's network are subject to the described robocall mitigation program.

Hart Telephone Company has contracted with TransNexus to provide robocall analytics and reputation scoring of our network's outbound traffic. The vendor's analytics identify patterns of suspected illegal robocalls and scores the calls based on their behavior and/or their status as suspected robocalls as reported to the Federal Communications Commission (FCC), Federal Trade Commission (FTC), and as reported by other carriers. Hart Telephone Company has access to the vendor's portal and receives **weekly** notifications about telephone numbers originating suspected illegal robocalls on its network, including from unassigned, inactive and do-not-originate TNs. Hart Telephone Company also receives reports via e-mail alerts if any of its numbers experience a change in reputation such as suspicious traffic patterns or other detected anomalies outside the normal behavior of our company's traffic. Hart Telephone Company will examine the reports and investigate and identify the source of the calls as unlawful or legitimate. To meet expanded Do Not Originate obligations, Hart Telephone Company also contracts with Award Consulting to provide a process for blocking calls that claim to be sourced from invalid numbers, for calls both originating and terminating on its network, using the Number Validation function.

Traceback

Hart Telephone Company is committed to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocalls that we learn are using our service to originate calls. Hart Telephone Company commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within twenty-four (24) hours.

Upstream Provider Knowledge

Hart Telephone Company knows all the carriers from which it receives traffic and has confirmed that all of the carriers are listed in the Robocall Mitigation Database. Hart has also reviewed the connected carrier's robocall mitigation plans to learn how the carriers monitor their originating traffic to mitigate illegal robocalls. Hart monitors incoming traffic from all connected carriers for suspicious call patterns indicative of illegal robocall activity. The connected carriers are made aware of any suspicious or illegal traffic identified and notified, that if the traffic does not cease, the calls may be blocked from entering Hart's network. Hart does not directly receive traffic from any foreign originating or intermediate provider. No provider is using Hart's network to carry or process a high volume of illegal traffic. In addition, Hart is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.

Customer Vetting

Hart Telephone Company has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Hart Telephone Company thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services.

Enforcement

If it is determined a Hart Telephone Company customer is originating prohibited unlawful robocalls on our network, Hart Telephone Company will either warn the customer to stop or terminate their service as allowed per Hart Telephone Company's policies that define the circumstances by which Hart Telephone Company will suspend or terminate service to a customer. The policies can be viewed here: **[https:// www.htconline.net/](https://www.htconline.net/)**