

Robocall Mitigation Plan

This robocall mitigation plan is for Ontonagon County Telephone Company, with headquarters at 108 West Superior Street, Munising, Michigan 49862.

Ontonagon County Telephone Company is a small/rural carrier eligible for the STIR SHAKEN extension granted to small voice service providers with fewer than 100,000 voice subscriber lines under 47 CFR § 64.6304

We perform the following roles in the call chain:

- A voice service provider with a STIR/SHAKEN implementation obligation serving end-users
- A non-gateway intermediate provider with a STIR/SHAKEN obligation

Ontonagon County Telephone Company has not been prohibited from filing a certification in the Robocall Mitigation Database.

Ontonagon County Telephone Company does not have a history of enforcement actions for illegal robocalls, TCPA or TSR violations, or related state law violations.

Ontonagon County Telephone Company uses the following affirmative, effective measures to prevent the origination or transit of illegal robocalls.

Know Your Customer

Ontonagon County Telephone Company vets the identity of new and renewing subscribers to prevent originating illegal calls before they are placed by collecting the following information:

Individual Subscriber:

- Photo ID
- Proof of Residency
- SSN (If Applicable)

Business Subscriber:

- Account Manager Information
- Federal Tax ID (If Applicable)
- Physical Location

We follow the caller ID authentication best practices for vetting caller identity and operational legitimacy for new and existing customers as described by the NANC Call Authentication Trust Anchor Working Group.

This process includes the collection and review of entity-identifying information to confirm that we have an authenticated relationship with the customer. We use this authenticated information to determine whether the customer is subject to any enforcement actions that restrict the type of calling that they may do, for example, if they have been banned from initiating telemarketing calls.

We also validate, when possible, that the entity has a legitimate right to use its asserted calling numbers.

Our contractual provisions with customers prohibit them from initiating illegal robocalls. If we find a customer initiating suspicious robocalls, we warn them to stop. If such traffic continues, then we terminate their service.

Know Your Upstream Provider

We confirm that the upstream provider has a certification in the Robocall Mitigation Database. We will not accept voice traffic from an unregistered provider.

We require that upstream providers have a reasonable robocall mitigation plan, including a vetting process for their customers and upstream providers.

We establish an understanding of the upstream provider's role in the call path for the traffic they will send to us, for example, whether they are acting as an originating voice service provider, a foreign intermediate provider, or a U.S.-based intermediate provider. We use this information to understand whether we will be obligated to authenticate unsigned traffic that we receive from them.

We monitor traffic from upstream providers and prohibit them from sending us illegal robocalls. If we find that an upstream provider is sending us suspicious robocalls, we warn them to stop. If such traffic continues, then we terminate their service.

Traceback

We respond within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium. We cooperate fully with such entities in investigating and stopping any illegal robocallers that use our service to originate, carry, or process illegal robocalls.

Robocall Mitigation Program

Ontonagon County Telephone Company has contracted with TransUnion/Neustar to provide monitoring and reporting systems to analyze high-volume voice network traffic and to identify and monitor patterns consistent with robocalls. TransUnion/Neustar's monitoring systems provide alerts on calling patterns with unusual spikes, traffic patterns, or attempted use of non-validated Telephone Number (TN) to detect patterns consistent with illegal robocalls. Robocall Mitigation is pre-integrated with both Caller ID Authentication Services (STI-VS) and Caller Name ID (CNAM). Using proprietary fraud modeling analytics and algorithms to produce a policy-based fraud indicator, stored in Neustar's Robocall Mitigation Database, TransUnion/Neustar overlays the traditional CNAM response with a Robocall Mitigation Indicator. Ontonagon County Telephone Company then uses that indicator to take appropriate action on the suspicious call.

For calls originating from our network, TransUnion/Neustar provides the following Robocall Protection:

- Provides detailed reporting identifying suspected illegal robocalls and alerts if calls originate where the calling number is invalid, unallocated, and/or on a Do-Not-Originate list.
- If the platform detects suspected robocalling patterns Ontonagon County Telephone Company will take appropriate action which may include suspending or terminating the subscriber.
- Supports a real time query to service to determine if a number originating on our network could be a robocall. Such calls can be blocked, or the terminating party can be notified via CNAM.
- For each new instance of robocalling using the Operating Service Provider (OSP) TNs, an alert is sent to the OSP in near real time. This alert will result in the OSP (manually) blocking the TN and

all TSPs being alerted via CNAM, through an overlay such as “ROBOCALLER”. The CNAM alerting helps address instances of spoofing of TNs that are not going through the OSP that owns the number.

If Ontonagon County Telephone Company is notified of traffic patterns consistent with illegal robocalls, or we have reason to suspect illegal robocalling or spoofing is taking place over our network, we will seek to identify the party that is using our network to originate, route, or terminate these calls and take appropriate action.

STIR/SHAKEN

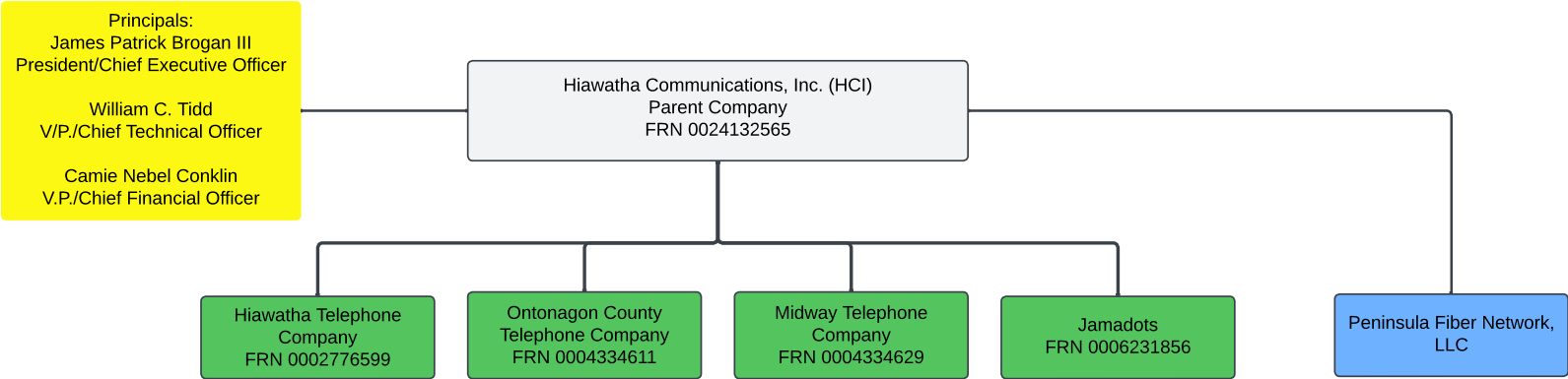
We have registered with the STI-PA using OCN 0717. We have our own STIR/SHAKEN certificate issued by the TransNexus Certification Authority (STI-CA) that we use when authenticating calls we originate. We have implemented a STIR/SHAKEN solution supplied by TransNexus.

We are exempt from STIR/SHAKEN implementation requirements for some calls because these calls rely on non-IP technology - 47 CFR 64.6304(d).

PRINCIPALS, AFFILIATES, SUBSIDIARIES, AND PARENT COMPANIES

See Organizational Chart below:

HIAWATHA COMMUNICATIONS ORGANIZATION CHART



 100% owned Subsidiary of HCI

 50% owned Affiliate of HCI

 Principals of HCI