

Palmetto Telephone Communications, LLC ROBOCALL MITIGATION PROGRAM

Palmetto Telephone Communications, LLC “PTC ” 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).

Palmetto Telephone Communications, LLC is owned by Palmetto Rural Telephone Cooperative, Inc. The principal of Palmetto Rural Telephone Cooperative is Jason J. Dandridge, the President of Palmetto Rural Telephone Cooperative, Inc. and its affiliates and subsidiaries. Jason J. Dandridge serves as CEO. Palmetto Telephone Communications, LLC is a subsidiary of Palmetto Rural Telephone Cooperative, Inc. Palmetto Telephone Communications, LLC is an affiliate of Palmetto Rural Telephone Cooperative, Inc. Palmetto Telephone Communications, LLC. and Palmetto Rural Telephone Cooperative, Inc are owned by its members.

PTC provides local service to fewer than 100,000 voice subscriber lines. The majority of customers are served on the non-IP portions of PTC ’s network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

Consistent with § 64.6303 (a)(1), PTC is ready to upgrade its entire network to allow for the initiation, maintenance, and termination of SIP calls and fully implement the STIR/SHAKEN framework. PTC ’s non-IP network is connected to carriers that do not support IP connectivity, therefore, PTC cannot upgrade its Non-IP network to IP.

To meet the non-IP network criteria for the continuing STIR SHAKEN extension (§ 64.6303 (a)(2)), PTC 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 PTC’s third-party representative on the ATIS PTSC Non-IP Call Authentication Task Force working group.

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

Robocall Mitigation Program

All voice traffic that originates on PTC ’s network is subject to the following Robocall Mitigation Program.

Call Analytics

PTC has contracted with Transnexus ClearIP “vendor” to provide robocall analytics and reputation scoring of our network’s outbound traffic. The vendor’s analytics monitor outbound voice traffic in real time to identify patterns of suspected illegal robocalls and prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected

illegal robocalls and alerts PTC if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. PTC immediately investigates any identified calls to determine if the caller was attempting to originate unlawful robocalls.

Investigation

PTC investigates calls identified by Transnexus as suspicious calls or those that have abnormal call volumes, patterns or activity consistent with illegal robocalls.

In addition, if PTC has any other reason to suspect illegal robocalling or spoofing is taking place over its network, PTC will work internally to identify the party that is using our network to originate, route, or terminate such calls and take appropriate action.

Enforcement

Illegal robocalls and fraudulent spoofing is prohibited on our network. If it is determined a PTC customer is using our network to fraudulently spoof calls or to originate illegal robocalls, PTC will either warn the customer to stop such practices or terminate their service as allowed per PTC policy.

All PTC customers sign a service agreement / application before new service is activated or existing service is renewed. The service arrangement/ application includes notice that PTC prohibits use of its network for the initiation of fraudulent spoofing and robocalls and if end users are found in violate of the service terms, the end user's service may be terminated.

Know your Customer

PTC has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. PTC 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.

Residential customers are asked to provide their full name, address (physical and mailing, if different), last four digits of their social security number, date of birth, phone number, email, and establish a security question, and a password. PTC also requires a photo ID for all new customers requesting voice service.

Business customers are asked to provide their full name, address (physical and mailing, if different), tax identification number, phone number, email, and establish a security question, and a password. To initiate an account change, a customer must provide their password or the answer to their security question prior to initiating a change. If the customer is unable to provide that information the customer service representative will call the customer back using the number they provided at account setup.

Upstream Provider Knowledge

PTC knows all the carriers from which it receives traffic and has confirmed that all of the carriers are listed in the Robocall Mitigation Database. PTC monitors incoming traffic from all connected carriers for suspicious call patterns indicative of illegal robocall activity, notifies the upstream carriers of any such traffic and warns the carriers that if the traffic does not cease, the calls may be blocked from entering PTC's network. In addition, PTC is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.

Traceback

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

Customer Education

PTC posts information on its website to educate customers on how to protect themselves from becoming a victim of unlawful robocalls and a process to report complaints related to robocall activity.