

Tri-County Communications Inc
d/b/a Intelligent Network Communications Inc

Robocall Mitigation Plan

This Robocall Mitigation Plan is submitted by Tri-County Communications Inc d/b/a Intelligent Network Communications Inc (INC) pursuant to the provisions of 47 C.F.R. § 64.6305, adopted by the Federal Communications Commission (FCC) which require all “voice service providers” to establish a “robocall mitigation plan”. This document sets forth the INC’s current policies and procedures designed to reduce or eliminate outbound illegal robocalls originating on its network. INC views these policies and procedures as constituting “reasonable steps” to avoid the origination of illegal robocalls on its network and in addition to following these steps INC commits to responding to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG), and to cooperate with such entities in investigating and stopping any illegal robocalls that may use its service to originate calls.

I. STIR-SHAKEN IMPLEMENTATION STATUS

As indicated in the FCC’s Robocall Mitigation Database, INC’s status with respect to STIR-SHAKEN implementation is as follows: The INC is a VoIP Service Provider through third party wholesale services. The Wholesalers and INC have implemented the STIR/SKAKEN authentication framework across its network and all calls originate are compliant with 47 CFR § 64.6301(a)(1) and (2). Further, the INC has established the policies and procedures set forth in this Robocall Mitigation Plan which are intended to stop anyone from using INC’s service to originate illegal robocalls.

II. TRACEBACK REQUESTS

INC and its Wholesalers will cooperate with the FCC, law enforcement and the (ITG) on all traceback requests and investigations to allow for timely and comprehensive law enforcement response efforts against illegal robocalls, INC will dedicate sufficient resources to promptly complete and provide responses to all traceback requests received from the FCC, law enforcement and/or the ITG, and commits to fully responding to any traceback request received within 24 hours after receiving the same. Within Appendix A, INC identifies a single point of contact for receiving all traceback requests. As part of its efforts to assist in the successful traceback of illegal robocalls, INC will going forward include within its service agreements language requiring traceback cooperation on any voice service calls exchanged. INC will work with its upstream/wholesale providers to suspected illegal robocall entered into the network or the customer of the service from which the call originated.

III. CUSTOMER VETTING PRACTICES

As a means of preventing or minimizing the origination of illegal robocalls through its voice services, INC will use best practices in vetting the identity of all its voice service subscribers, whether a residential or business/commercial subscriber. The subscriber vetting process is intended to help determine the legitimacy of a customer for the purpose of establishing a service relationship. INC looks to confirm the identify of customers using its voice services through collecting information such as physical customer location, contact person(s), state or country of incorporation and the nature of the customer’s business. INC’s efforts to vet retail and business/commercial subscribers occurs during the process of provisioning customer requested services (for example in appropriately sizing the facilities to their claimed intended use), executing the INC’s required service agreements, and granting the customer the right to use the VoIP service. Commercial end users, comprised of larger businesses with more complex service configurations, are generally recognized as presenting a higher risk of perpetrating illegal robocalls and thus those customers, at the INC’s discretion, may be subject to an additional

review, including a more stringent background check and possibly a site visit. Further, with respect to meeting existing obligations to take affirmative, effective measures to prevent new and renewing customers from originating illegal calls. INC utilizes service agreements and acceptable use policies as a means of preventing its new and existing subscribers from using their voice services in ways that would be in violation of local, state, or federal laws, or to engage in deceptive or fraudulent activity. These documents governing use of INC provided services include terms indicating specifically to all customers that their services should not be used for the purpose of making illegal robocalls, and INC reserves authority within its service agreements to suspend or terminate a subscriber's voice service for violating applicable service-related terms.

IV. TELEPHONE NUMBER VALIDATION PRACTICES

Telephone Number Validation refers to the confirmation of the customer or end-user right to use a telephone number in connection with their subscribed voice service(s). In accord with industry best practices, the INC have procedures in place to confirm the calling customer's right to use a telephone number. Specifically, a subscriber of the INC's services is permitted to use a telephone number as their caller identity if a number is directly managed by the INC and/or obtained by the INC via an underlying partner. Further, for: (1) single line or multi-line service subscribers with services connected via IP, our switching equipment has been set up to only accept calls from the number associated or assigned to that subscriber account. These screening capabilities enable an automated and secure method of validating originating telephone numbers.

V. INTERNATIONAL CALL ORIGINATORS

The Provider is not currently an international voice services provider. If at any time the Provider does sell its services to customers which are international call originators using North American Numbering Plan resources, it will familiarize itself with and develop best practices for fulling vetting such customers and performing telephone number validation on all international originated calls.

VI. KNOW YOUR UPSTREAM PROVIDER PROCEDURES

INC, in the interest of providing the highest quality services to all voice service customers, is committed to taking those steps necessary to ensure that any upstream providers providing connectivity are equally committed to monitor their networks and preventing use for the transmission of illegal robocalls. This includes the use of robocall prevention language in any contracts that the INC may directly have with any upstream provider entities.

VII. ONGOING ROBOCALL MITIGATION PRACTICES

The INC monitors the usage of its network and examines call detail records (CDRs) on a recurring basis for the purpose of detecting suspicious call activity and/or calling patterns. When network usage patterns consistent with illegal robocalls are detected or INC otherwise suspects illegal robocalling or spoofing taking place on its network, it immediately seeks to identify the party that is originating, terminating, or routing these calls so that it may take appropriate action. The actions taken may include, but are not limited to: initiating a traceback investigation; verifying that the originating customer owns or is authorized to use the Caller ID number; determining whether the Caller ID name sent to a receiving party matches the customer's corporate name, trademark, or d/b/a name; terminating the party's ability to originate, terminate, or route calls on the network; and providing notice to law enforcement authorities. As part of its Plan to mitigate and prevent any originating robocalls on its network, the INC is committed to early identification and investigation of possible robocalling situations. In monitoring usage of its network, particular attention is given to: (1) higher than normal subscriber traffic volume including large bursts of traffic in small timeframes or inconsistent volumes of traffic (spikes in usage); (2) originating calls of short duration and low call completion percentages; (3) originating calls with sequential called to number dialing patterns; (4) repeated calls made to do-not-call registry or invalid numbers; and (5) calls to NPA-NXXs not assigned by the North American Numbering Plan Administrator.

Appendix A

Tri-County Communications Inc

d/b/a Intelligent Network Communications Inc (INC)

Certification

I, James C Watson, do hereby certify the following:

a. INC operates as a VoIP Service Provider and implemented the STIR/SHAKEN authentication framework across its network and all calls it originates are compliant with 47 CFR § 64.6301.

b. Business name and primary address are as follows:

Tri-County Communications Inc d/b/a Intelligent Network Communications Inc

392 Rock Church Rd, Catawissa MO 63015

President: James Watson

Contact number: 636 257 2020

Email: Chris@inc2talk.com

c. INC has not previously used any other business name.

d. INC has no affiliates providing services regulated by the FCC.

e. The name, title, department, business address, telephone number, and email address of the individual responsible for addressing robocall related issues and Traceback Requested Point of Contact follows:

Tri-County Communications Inc d/b/a Intelligent Network Communications Inc

392 Rock Church Rd., Catawissa MO 63015

President: James Chris Watson

Contact number: 636 257 2020

Email: Chris@inc2talk.com

f. INC is not prohibited from filing in the Robocall Mitigation Database due to an enforcement action.

g. INC is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.

James C Watson

James Watson

Its PRESIDENT

February 17, 2026

