

Farmers Mutual Telephone Company

Robocall Mitigation Plan – 2026 Certification

Company Name: Farmers Mutual Telephone Company

Address: 410 Broad Avenue, Stanton, Iowa 51573-0220

Phone: 712.829.2111

FCC Registration Number (FRN): 0003-7262-88

1. Role in the Call Chain

Farmers Mutual Telephone Company is a facilities-based voice service provider serving end users. As such, the company has a STIR/SHAKEN implementation obligation under 47 CFR § 64.6301 et seq.

Farmers Mutual Telephone Company has not been prohibited from filing a certification in the FCC Robocall Mitigation Database and has not been subject to FCC enforcement actions related to illegal robocalls.

2. Overview of Robocall Mitigation Program

Farmers Mutual Telephone Company maintains a multi-layered robocall mitigation program designed to prevent the origination and transmission of illegal robocalls. The program includes:

- Customer vetting and ongoing monitoring
- Upstream provider verification
- STIR/SHAKEN authentication and verification
- Analytics-based call monitoring
- Do Not Originate (DNO) number enforcement
- Traceback cooperation

This program is reviewed periodically to ensure continued compliance with FCC rules and orders.

3. Know Your Customer (KYC) Policies

Farmers Mutual Telephone Company applies customer vetting procedures designed to reduce the risk of illegal robocall origination.

Initial Customer Review

Prior to activating voice service, the company:

- Collects and verifies customer-identifying information
- Confirms lawful authority to use assigned telephone numbers
- Reviews intended use of service and expected calling patterns
- Screens for publicly available enforcement history, where appropriate

STIR/SHAKEN attestation levels are assigned consistent with the degree of network control and customer validation.

Ongoing Monitoring

Customer traffic is subject to ongoing monitoring for:

- Abnormal call volume patterns
- Short-duration, high-volume call behavior
- Spoofed or mismatched caller ID indicators
- Calls using invalid, unallocated, or DNO-designated numbers

If suspicious activity is identified, Farmers Mutual Telephone Company investigates promptly. Corrective action may include written notice, traffic restriction, suspension, or termination of service.

4. Know Your Upstream Provider Policies

Farmers Mutual Telephone Company accepts traffic only from upstream providers that:

- Are listed in the FCC Robocall Mitigation Database
- Maintain documented robocall mitigation programs
- Comply with applicable STIR/SHAKEN obligations

Where applicable, the company evaluates whether upstream providers function as originating providers, intermediate providers, or gateway providers and confirms appropriate compliance responsibilities.

If upstream traffic is identified as transmitting illegal robocalls or failing to implement reasonable mitigation practices, Farmers Mutual Telephone Company may restrict, block, or terminate traffic from that provider.

5. Analytics and Traffic Monitoring

Farmers Mutual Telephone Company utilizes call analytics and policy enforcement systems provided by:

- ClearIP
- TransNexus

These systems provide:

- Real-time call traffic monitoring
- Detection of invalid, unassigned, or unallocated numbers
- Detection of Do Not Originate (DNO) number usage
- Reputation scoring and pattern analysis
- STIR/SHAKEN signing and verification support

Traffic exceeding established risk thresholds is flagged for review. Where risk indicators meet blocking criteria, calls may be automatically blocked in accordance with FCC rules permitting network-based blocking of illegal traffic.

6. Do Not Originate (DNO) Compliance

In accordance with FCC orders requiring providers to take steps to prevent spoofed calls from designated Do Not Originate numbers, Farmers Mutual Telephone Company enforces DNO protections through automated analytics and blocking mechanisms.

The company's mitigation program includes:

- Validation of originating numbers against DNO-designated lists
- Blocking of calls using numbers identified as invalid, unallocated, or designated as Do Not Originate
- Investigation of customers or upstream sources associated with DNO violations

If DNO violations are detected, Farmers Mutual Telephone Company takes appropriate remedial action, which may include traffic blocking, investigation, and service termination.

7. STIR/SHAKEN Implementation

Farmers Mutual Telephone Company has implemented STIR/SHAKEN call authentication in compliance with 47 CFR § 64.6301 et seq.

- Registered with the STI Policy Administrator (STI-PA) under OCN 1174
- Holds a valid STI certificate issued by the TransNexus Certification Authority
- Signs IP-originated calls where required and technically feasible
- Verifies signed calls received over IP interconnections
- Applies appropriate attestation levels consistent with customer validation

Non-IP traffic is handled consistent with applicable FCC exemptions and transitional requirements.

8. Traceback Cooperation

Farmers Mutual Telephone Company cooperates fully with the Industry Traceback Consortium and law enforcement agencies.

The company:

- Responds to traceback requests within 24 hours
- Maintains relevant call detail records consistent with regulatory requirements
- Investigates identified illegal traffic sources
- Implements appropriate mitigation actions upon confirmation

9. Record Retention and Compliance Review

Farmers Mutual Telephone Company maintains documentation related to:

- Robocall mitigation policies
- Traceback responses
- Customer vetting procedures
- STIR/SHAKEN configuration

Policies and procedures are periodically reviewed to ensure ongoing compliance with FCC requirements.

10. Certification

Farmers Mutual Telephone Company certifies that:

- It has implemented effective robocall mitigation practices.
- It has implemented STIR/SHAKEN authentication consistent with FCC rules.
- It enforces DNO protections and blocks illegal traffic as required.
- This filing is accurate and complete to the best of its knowledge.

Certification is submitted in the FCC Robocall Mitigation Database pursuant to 47 CFR § 64.6305.