



Cap Rock Telephone Cooperative, Inc.

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Robocall Mitigation Plan

This Robocall Mitigation Plan describes the specific reasonable steps that Cap Rock Telephone Cooperative, Inc. ("Cap Rock") has taken to avoid the origination, carrying, or processing of illegal robocall traffic on its network.

Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Robocalls

Cap Rock has a "know-your-customer" policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. Specifically, Cap Rock follows the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. In addition, although Cap Rock's customers generally do not generate a high volume of calls, were the company to receive a request for high-volume origination services, we would exercise caution and extensively investigate such customers before granting access to the services.

"Know-Your-Upstream Provider" Procedures

Most of the connections that Cap Rock has with upstream providers have been in place for many years, and we know these companies very well (e.g., AT&T). However, Cap Rock exercises due diligence before accepting traffic from any new upstream provider as we seek to ensure that such providers are not using Cap Rock to carry or process a high volume of illegal traffic. Specifically, Cap Rock collects information such as the upstream provider's physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of their business.

Use of Call Analytics Systems

Cap Rock uses software provided by TransNexus to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts us 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. Cap Rock immediately investigates any identified calls to determine if the caller was attempting to originate unlawful robocalls. If we determine that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as appropriate.

Commitment to Respond to Traceback Requests

Cap Rock commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its services to originate, carry, or process illegal robocalls.

ROBOCALL MITIGATION PLAN

CR Telco is a non-facilities-based reseller of long-distance service (non-gateway intermediate provider). Our wholesale network provider is Sinch. This Robocall Mitigation Plan describes the specific reasonable steps that CR Telco has taken to avoid the carrying or processing of illegal robocall traffic on our wholesale provider's network.

"Know-Your-Upstream Provider" Procedures

CR Telco only offers long distance service to the customers of its local exchange carrier parent company, Cap Rock Telephone Cooperative, Inc. Therefore, CR Telco knows very well the only upstream provider from which it receives traffic.

Use of Call Analytics Systems

CR Telco is a non-facilities based reseller of long distance service and therefore relies, in part, on the call analytics systems of its wholesale provider, Sinch.

In addition, CR Telco only offers long distance service to the customers of its local exchange carrier parent company, Cap Rock Telephone Cooperative, Inc. ("Cap Rock"). Cap Rock uses software provided by TransNexus to monitor its outbound voice traffic in real time to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts Cap Rock if it originates 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. Cap Rock immediately investigates any identified calls to determine if the caller was attempting to originate unlawful robocalls. If it determines that the caller was attempting to originate unlawful robocalls, then Cap Rock either warns them to stop or terminates their service as appropriate.

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