

BENKELMAN TELEPHONE CO., INC.

ROBOCALL MITIGATION PLAN

This Robocall Mitigation Plan (“Plan”) is for Benkelman Telephone Co., Inc. (“Benkelman”), a rural local exchange carrier that provides voice and broadband service in Nebraska. The service provided by Benkelman to its residential and business customers is an analog POTS service capable of originating only one call at a time, whether a local or long distance call, for each POTS service to which a customer subscribes.

Benkelman is a voice service provider with a STIR/SHAKEN implementation obligation serving end users. Benkelman does not have a history of enforcement actions for illegal robocalls or any related state law violations. Benkelman uses the following affirmative and effective measures to prevent the origination or transit of illegal robocalls.

KNOW YOUR CUSTOMER

Benkelman’s “Know Your Customer” process includes the collection and review of identifying information to confirm that we have an authenticated relationship with the customer. Benkelman investigates new and renewing customers seeking access to high-volume origination services to mitigate the potential of any new or renewing customer originating illegal robocalls.

Each potential new customer (business or residential) must complete our service application. We assist with the various needed information on that form and require the customer to sign the application. For business customers, we inquire about whether they will be a high-volume user. If they verify that they are not going to be a high-volume user, we complete the application. If the customer indicates that they will or potentially could be a high-volume user, we make sure they understand that their service may be terminated if it is determined that the service is being used or abused in any manner deemed as illegal activity by the FCC. The application includes a statement to that effect. In general, Benkelman’s customer tariff prohibits unlawful or fraudulent use of Benkelman’s services and specifies that Benkelman may refuse the installation of or continuation of service if the customer plans to or uses the service in an unlawful way. If we find a customer initiating suspicious robocalls, we warn them to stop. If such traffic continues then we terminate their service.

Physical verification is mandatory for all new residential and business installations at the time the potential customer applies for service. We require to see a valid driver’s license or other valid identifying documentation and make a photocopy of all authorized party’s licenses or other valid identifying documentation on each account for verification. Federal identification numbers and State of Incorporation documents are required for new business service installations.

CALL BLOCKING

Benkelman offers a free service called Selective Call Blocking. All customers may sign up for this service at any point in time. Benkelman does not use any third party analytics for blocking calls.

KNOW YOUR UPSTREAM PROVIDER

We have a vetting and review process for upstream providers, that is, providers that send us voice traffic that we terminate or transit to other providers. 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, and that they have appropriate means to identify suspicious traffic.

We establish an understanding of the upstream provider's role in the call path for the traffic they will send to us, identifying 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.

The only inbound voice traffic that Benkelman receives over SIP trunks comes from Sinch, which is fully STIR/SHAKEN compliant. While Benkelman expects that all incoming traffic from Sinch will be signed traffic, any unsigned traffic that Benkelman might receive from Sinch can be identified and investigated with Sinch related to any robocall complaints.

Our contractual provisions with upstream providers prohibit them from sending us any traffic that is illegal. 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.

PROCESS FOR ROBOCALL MITIGATION

Benkelman validates, when possible, that a customer has a legitimate right to use its asserted calling numbers. Benkelman also has in place policies that are designed to detect and prevent fraudulent traffic on its network.

Benkelman uses the services and software of RVW, Inc. ("RVW"), a telecommunications data services company, to monitor all outbound voice traffic for origination and transit of illegal robocalls. Benkelman's switch pushes call files to an ftp site that RVW accesses twice a day. RVW downloads the files each business day. On weekends and holidays, files are processed on the next business day.

Each business day, RVW converts the switch files into a standardized RVW LAMA format. During the conversion, call patterns are monitored and suspicious call patterns are identified. These will be originating calls from a single telephone number which exceed established thresholds based on prior usage. RVW can then run additional analysis on the data and produce detailed reports, which include the originating and terminating numbers along with call times and call duration. These detailed reports are then forwarded to Benkelman's General Manager and CO Manager for further investigation.

Benkelman immediately investigates any identified suspicious calls to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls. If we determine that the traffic was likely unlawful, then we provide a warning to stop sending such traffic. If such traffic continues, then we terminate their service.

RVW realizes that at times, schools, civil defense, and other organizations may make mass callings that we are not aware of. This calling would also be forwarded to the Benkelman General Manager and CO Manager for further investigation.

TRACEBACK

Benkelman will respond within 24 hours to all traceback requests, and will cooperate with the Federal Communications Commission, law enforcement, and the industry traceback consortium. We will cooperate fully with such entities in investigation of and stopping any illegal robocallers that use our service to originate, carry, or process illegal robocalls. Benkelman's use of the RVW software provides a quick and viable way for Benkelman to respond to any traceback request that may be received.

STIR/SHAKEN PLANNING

Benkelman is continuing to work with a third-party vendor for the purchase of equipment to implement STIR/SHAKEN. We are also in discussions with our long-distance providers for input on services they can offer to help mitigate the problems with STIR/SHAKEN. Benkelman continues to evaluate which vendors and equipment will best serve our needs.

EXTENSIONS

Benkelman Telephone Co., Inc. has received the following type of extension of the STIR/SHAKEN implementation requirements under §64.6304 of the FCC's rules: the non-IP networks extension (§64.6304(d)) because it cannot initiate, maintain, carry, process, and terminate SIP calls, but it complies with the requirements of 47 C.F.R. §64.6303(a)(2).