

KanOkla Telephone Association ROBOCALL MITIGATION PLAN

KanOkla Telephone Association is a small/rural carrier with less than 2500 voice subscriber lines.

KanOkla Telephone Association has implemented the following Robocall Mitigation Plan to detect and prevent unlawful robocalls from originating on its network.

All calls that originate on KanOkla Telephone Association 's TDM portion of the network are subject to the described robocall mitigation program.

KanOkla Telephone Association has contracted with an engineering firm for ***Robocall Origination Detection Service***. The firm will download KanOkla Telephone Association's CDRs monthly and look for patterns indicative of originating robocalling. The firm will email KanOkla Telephone Association a monthly report identifying any detected suspicious call activity. KanOkla Telephone Association will examine the reports and investigate and identify the source of the calls as unlawful or legitimate.

Enforcement

If it is determined a KanOkla Telephone Association customer is originating prohibited unlawful robocalls on our network, KanOkla Telephone Association will either warn the customer to stop or terminate their service as allowed per KanOkla Telephone Association 's policies that define the circumstances by which KanOkla Telephone Association will suspend or terminate service to a customer.

Traceback

KanOkla Telephone Association is committed 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.

Customer Vetting

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

Jill Kuehny, Chief Executive Officer (CEO)

David Nance, Chief Operations Officer (COO)

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