



CALL
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Robocall Mitigation Plan

Updated for compliance with

The Sixth Report and Order.

February 2026

Pattersonville Telephone Company (PTC) understands that a robocall is an unsolicited call from an auto-dialer that delivers a prerecorded message and will comply with efforts to control and investigate such calls.

PTC is a Small Service Provider, serving fewer than 100,000 voice service subscriber lines and therefore, continues to qualify for the extension of the STIR SHAKEN implementation deadline as a small voice service provider 47 CFR § 64.6304 (a)(2) that has non-IP portions within its network §64.6304(d).

Status of STIR/SHAKEN Implementation

- PTC has fully implemented STIR/SHAKEN on the IP portion of the network.
- PTC has implemented a STIR/SHAKEN solution through a third-party, Toly Digital Networks, for the limited voice traffic currently traveling via SIP trunks.
- PTC is using TOLY for STIR/SHAKEN. Toly Digital Networks' compliance is as follows
 - All the voice traffic that originates on our network is subject to the robocall mitigation program described below and is 100% STIR/SHAKEN compliant in partnership with TransNexus as the STI-Certificate Authority (STI-CA) service provider for the Company. Additionally, our network will support call termination services for our customers where we are not originating the call but passing the call over our networks/partners via SIP and ensuring we or our partners maintain STIR/SHAKEN information in the SIP messaging. This is also part of all new customer verification and testing prior to implementing services. (*provided by TOLY digital Networks Robocall Mitigation Plan*)
- PTC is further working towards implementing STIR/SHAKEN in parts of its network. PTC will implement such a product to authenticate voice calls delivered over the non-IP portions of its network if and when such a protocol is developed and indorsed by the Commission and the necessary equipment and/or software is available on the commercial market.



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Analytics and Traceback

- PTC uses on Toly Digital Networks to monitor and inform PTC of violations on its IP traffic
 - Toly Digital Networks uses software provided by TransNexus to monitor our outbound voice traffic to identify and prevent the potential origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts Toly if they 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. Toly immediately investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If Toly determine that the caller was attempting to originate unlawful robocalls, they either warn them to stop or terminate their service as appropriate. Additionally, Toly provide our customers tools when receiving inbound calls to utilize STIR/SHAKEN information (or lack thereof), as well as other filters to help identify and/or screen potential robocalls. (*information provided by Toly Digital Networks*)
 - Toly Digital Networks will notify PTC of any violations and if further actions are needed.
- PTC intends to cooperate with traceback requests from law enforcement, carriers, the Commission and registered traceback consortiums.
- PTC will have a collaboration of team members designated to investigate Robocall incidents. This will ensure a quick response to each event. Responses will be submitted within 24 hours.

PTC's network/subscriber profile in itself will prevent Robocalls in general:

- All calls originating within PTC's network will be subject to the Robocall Mitigation Plan.
- All lines can only dial out as the number designated to that line.
- All lines, including our business customers, can only place one call at a time per line.
- PTC does not allow the customer the option to choose the calling number information that is sent out with each call from any given line at any given time.
- SIP lines have limited registrations.
- KNOW YOUR CUSTOMER
 - PTC has a long history of having close relationships with their customers and getting to know them on a more personal level. Good for service and business.
 - PTC has a low volume of business lines and requests tax ID as verification for business access during the application process.
 - PTC verifies customer information during installation process for Caller ID and CNAM
- PTC reserves the right to take action against any violation of Term of Service as it seems fit including termination of service.



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PTC's Do-Not-Originate

- PTC uses Award Consulting for blocking calls from D0-Not-Originate Numbers. Award Consulting has a process for blocking calls that claim to be sourced from invalid numbers, for calls both originating and terminating on our switch.

The process includes

- A reasonable licensed list of DNO numbers.
- A list of invalid prefixes (e.g. NPA-NXXs that just don't exist) that should also not be sourcing calls.
- A configuration to block calls from numbers on either the DNO list or the list of unallocated prefixes (invalid numbers).
- Updates done regularly to both lists to ensure compliance.

PTC's plans moving forward:

- New or existing subscribers requesting or with multiple call paths will receive informational material regarding Robocalls and legal ramifications associated with such infractions.
- Educate new customers on the Trace Act and the implications of its violation.

*PTC certification has not been prohibited from filing in the Robocall Mitigation Database, nor has any prior certification been removed by Commission action. *