

Cordova Telephone Cooperative (CTC or the Company) (FRN 0001571181) has implemented a Robocall Mitigation Program, required by Section 4(b)(5)(C) of the TRACED Act, and 47 C.F.R. §64.6305, as documented herein. CTC is a rural local exchange carrier operating in the state of Alaska, and as of June 30, 2023, has implemented STIR/SHAKEN in the IP portions of its network. CTC, among other things, has been authenticating caller ID information for all SIP calls that originate on those portions of the network. CTC continues to be subject to the extension for implementing STIR/SHAKEN in the non-IP portions of its network pursuant to 47 C.F.R. §64.6304(d).

CTC's Robocall Mitigation Program includes, but is not limited to, the following:

1. CTC maintains a rigorous "know your customer" process, specifically designed to prevent new and renewing customers from using CTC's network to originate illegal calls. CTC investigates new and renewing customers seeking access to high-volume origination services and, if necessary and possible, modifies service terms and conditions to mitigate the potential of any new or renewing customer originating illegal robocalls.
2. CTC has implemented a "know your upstream provider" process that includes exercising due diligence prior to accepting traffic from such providers. This process includes, but is not limited to, collecting information from upstream providers such as physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of the upstream provider's business. If and when necessary, CTC will take additional steps, such as adopting contract terms and conditions that allow termination of the traffic exchange in the event the upstream provider attempts to use CTC's network to carry or process a high volume of illegal traffic.
3. CTC has processes in place to ensure it responds fully to any traceback request from the FCC, civil or criminal law enforcement agents, and the industry traceback consortium in a timely manner. CTC has designated a traceback response contact(s) who are aware of the traceback requirements contained in 47 C.F.R. §64.1200(n)(1) and the obligations contained in 47 C.F.R. §64.1200(n)(2) in the event the Company receives notification of a traceback request.
 - a. Upon receipt of any traceback request, CTC will take steps to promptly investigate the traffic, and if a notice is received as outlined in FCC rules, will also take steps to effectively mitigate the illegal traffic.
 - b. If CTC determines that the identified traffic is not illegal, it will provide an explanation in the report it submits to authorities as to how CTC reached this conclusion.
 - c. If CTC determines that the identified traffic came from another voice provider with direct access to the United States public switched telephone network, the report will identify that voice service provider and the notified voice service provider should take mitigation steps if possible, or
 - d. If CTC does not reach either of these conclusions (b or c above), its report will include the steps it will take to effectively mitigate this traffic.
4. CTC utilizes Metaswitch's Call Guardian Authentication Hub (CGAH) to analyze high-volume voice traffic to identify and monitor patterns consistent with robocall campaigns.
5. CGAH also analyzes traffic for patterns indicative of fraudulent calls – e.g., identify short duration calls with low completion rates.

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6. If CTC detects a pattern consistent with illegal robocalls, or otherwise has reason to suspect illegal robocalling or illegal spoofing is taking place over its network, the Company will seek to identify the party that is using its network to originate, route, or terminate these calls and take appropriate action.
 - Taking appropriate action may include, but is not limited to, initiating a traceback investigation, verifying that the originating commercial customer owns or is authorized to use the Caller ID number, determining whether the Caller ID name sent to a receiving party matches the customer's corporate name, trademark, or d/b/a name, terminating or suspending the party's ability to originate, route, or terminate calls on its network, or notifying law enforcement authorities.