

FILER MUTUAL TELEPHONE COMPANY ROBOCALL MITIGATION PLAN

This Robocall Mitigation Plan describes the specific reasonable steps that Filer Mutual Telephone Company ("Filer Mutual" or "the Company") 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 Calls

Filer Mutual 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, for new and renewing customers, the Company:

- Confirms the customer's identity and, if it is a business, its incorporation documents.
- Confirms the customer's service address.
- Verifies the customer's credit history and business reputation.
- Verifies customer information when contracts are renewed or services are added.
- Verifies the customer's identity and their right to use the telephone number presented on calls.

Although Filer Mutual's customers generally do not generate a high volume of calls, were the Company to receive a request for high-volume origination services, it would exercise caution and extensively investigate such customers before granting access to the services.

In addition, Filer Mutual has in place an enforceable terms of use and/or an acceptable use policy. It also has policies that define the circumstances by which it will deny, suspend or terminate service to a customer.

"Know-Your-Upstream Provider" Procedures

Filer Mutual exercises due diligence before accepting traffic from an upstream provider. Specifically, the Company 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

Filer Mutual uses TransNexus ClearIP! analytics technologies and services to monitor traffic on its network and identify potentially unlawful call origination activity. If Filer Mutual has a reasonable basis to believe that a customer is originating illegal robocalls, it will require the customer to remedy the problem. If effective action is not taken, Filer Mutual will suspend and/or terminate service to the customer.

Filer Mutual Telephone Company blocks the following types of calls by default:

- Calls that purport to be from invalid, unallocated, or unused numbers.
- Calls from phone numbers on a Do-Not-Originate list.

STIR/SHAKEN Implementation

Filer Mutual has implemented STIR/SHAKEN through use of the TransNexus ClearIP! Authentication Hub. This is a managed end-to-end call authentication solution that fully satisfies the FCC's STIR/SHAKEN requirements.

Commitment to Respond to Traceback Requests

Filer Mutual 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 illegal robocallers that use its services to originate, carry, process illegal robocalls.

- Filer Mutual Telephone Company has designated an individual as a dedicated point of contact for addressing traceback requests, and a backup person to that individual.



Robert Kraut
COO