



**Washington County Rural Telephone Cooperative, Inc.
Robocall Mitigation Program**

This Robocall Mitigation Plan describes the specific reasonable steps that Washington County Rural Telephone Cooperative, Inc. d/b/a TeleMedia (TeleMedia) 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 Robocalls

TeleMedia has a “know-your-customer” policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. TeleMedia’s business customers are small businesses that are physically located in our service territory. Prior to a new business customer ever making a call on TeleMedia’s network, we personally know, or get to know, the business owners and/or management. This personal touch gives TeleMedia a clear view of whether the business is a risk for originating illegal robocalls.

TeleMedia has never received a request for high-volume origination services. However, were TeleMedia to ever receive such a request, we would exercise caution and extensively investigate the requesting entity prior to granting access to the service. In particular, we would collect information such as their physical business location, contact person(s), state or country of incorporation, federal tax ID, and the general nature of their business.

All TeleMedia customers are only able to originate calls from a number that identifies in the company’s switches as a number that has been assigned to them. This prevents TeleMedia’s customers from originating calls with a spoofed caller ID number, which greatly mitigates the likelihood of illegal robocalls originating on TeleMedia’s network.

In TeleMedia’s Terms and Conditions of Service posted on its website, it states that the customer agrees not to use their service in an unlawful or fraudulent manner; if a customer violates the terms of the agreement, their account and services will be canceled. TeleMedia would not hesitate to enforce this policy if a customer was found to be using their voice service to make illegal robocalls.

“Know-Your-Upstream Provider” Procedures

Currently, the only upstream providers from which TeleMedia receives traffic are AT&T and Frontier. TeleMedia’s connections with these providers have been in place for many years, and we know them very well. Before accepting traffic from any new upstream provider, TeleMedia would exercise due diligence and seek to ensure that the provider is not using TeleMedia to carry or process a high volume of illegal traffic. Specifically, TeleMedia would collect 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

All inbound calls to TeleMedia voice customers are run through Innovative Systems' APMAX Identity Hub Solution, which runs a database dip to identify known spammers. While TeleMedia does not presently block these calls, we use caller ID to alert the called party that the call is "Likely Spam."

Commitment to Respond to Traceback Requests

TeleMedia 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 any illegal robocallers that use its services to originate, carry, or process illegal robocalls.