

**CHICKASAW TELEPHONE COMPANY
CHICKASAW TELECOMMUNICATIONS SERVICES, INC.
ROBOCALL MITIGATION PLAN**

This Robocall Mitigation Plan describes the specific reasonable steps that Chickasaw Telephone Company (“CTC”) and Chickasaw Telecommunications Services, Inc. (“CTSI”) have taken to avoid the origination, carrying, or processing of illegal robocall traffic on its networks.

Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Calls

CTC and CTSI have 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 business customers, CTC and CTSI collect information such as the customer’s physical business location, contact person(s), state or country of incorporation, federal tax ID, and the general nature of their business.

Although CTC and CTSI’s customers generally do not generate a high volume of calls, were either 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.

“Know-Your-Upstream Provider” Procedures

CTC and CTSI exercise due diligence before accepting traffic from an upstream provider as we seek to ensure that such providers are not using CTC and CTSI to carry or process a high volume of illegal traffic. Specifically, CTC and CTSI 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

CTC and CTSI use Neustar-TransUnion for Robocall Mitigation. The Portal uses Fraud Threshold Management, Robocall Mitigations Preference, Deny and Allow Lists, Fraud Alerts and Reports of high runner/calls. These features block, direct and warn the called party based on the Robocall Mitigation score and Robocall Mitigation response category. Also has a custom allow and deny list, shows telephone numbers originating from our network that are suspected robocalls and has standard reports to show daily high-runner reports.

Commitment to Respond to Traceback Requests

CTC and CTSI commit 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.