



400 East Main Street, PO Box 208, Springport MI 49284 www.springcom.com
517-857-3100

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SPRINGCOM AND SPRINGPORT TELEPHONE COMPANY ROBOCALL MITIGATION PLAN UPDATE

KNOW YOUR CUSTOMER During the application process for new service, Springcom and Springport Telephone Company (Companies) verify an applicant's identity using state issued photo identification, address, applicant/business name, social security number, and/or Tax ID.

ROBOCALL MITIGATION AND TRACEBACK The Companies hereby certify that they will respond to all trace back requests from the FCC, law enforcement and industry traceback groups. The Companies also agree to investigate any robocalls that may originate from their network and mitigate any and all such calls. The Companies' networks are small and therefore any and all traffic patterns can be identified and investigated. The Companies will suspend service for any subscriber that uses their service to originate illegal robocalls. Springport commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within 24 hours.

UPSTREAM PROVIDER KNOWLEDGE The Companies know the carrier from which it receives traffic and has confirmed the carrier is listed in the Robocall Mitigation Database. The Companies monitor incoming traffic from its connected carrier for suspicious call patterns indicative of illegal robocall activity. No provider is using The Companies' network to carry or process a high volume of illegal traffic.

STIR/SHAKEN EXEMPTION 47 CFR § 64.6304 allows for an exception of STIR/SHAKEN for voice service providers with fewer than 100,000 subscribers until June 30, 2021. The Companies have less than 100,000 subscribers and thereby qualify for said exception.

Type of Extensions Received Under 47 C.F.R. §64.6304

Springport Telephone Company has received the following types of extensions of the STIR/SHAKEN implementation deadline under §64.6304 of the FCC's rules: (1) the small voice service providers extension (§64.6304(a)), and (2) the non-IP networks extension (§64.6304(d)).

Status of STIR/SHAKEN Implementation

Springport Telephone Company's network only uses non-IP technology that cannot initiate, maintain, and terminate SIP calls, making it incompatible with STIR/SHAKEN. Thus, Springport is unable to implement STIR/SHAKEN in any part of its network at this time and must continue to avail itself of the non-IP networks extension under §64.6304(d) of the FCC's rules. Springport will implement a call authentication protocol for voice calls delivered over the non-IP portions of its network when such a protocol has been fully developed and finalized by industry standards and the necessary equipment and software is available on the commercial market.