

**BPM, Inc.**  
**DBA Noxapater Telephone Company**  
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**June 10, 2026**

**BPM, Inc.**  
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**Robocall Mitigation Program**

Noxapater Telephone Company is eligible for the continuing extension of the STIR SHAKEN implementation deadline on non-IP networks as a small voice service provider (64.6304(a)(2) that has non-IP portions within its network(64-6304(d). Noxapater Telephone Company provides local service to fewer than 100,000 voice subscriber lines. Noxapater Telephone Company is 100% non-IP. All customers are served on Noxapater's non-IP network which relies on technology that cannot initiate, maintain, carry, process, and terminates SIP calls.

#### **Robocall Mitigation Program**

All voice traffic that originates on the Company's network is subject to the following Robocall Mitigation Program.

The Company commits to cooperating with the new FCC, law enforcement and the Industry Traceback Consortium (US Telecom) in investigating and stopping any illegal robocalls. Noxapater commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium within twenty-four (24) hours.

**The Company does not use a vendor for robocall analytics.**

The Company monitors all originating network traffic for suspicious or abnormal call pattern, volume or activity. Calls that meet the below qualifying factors are investigated internally to determine if the calls are legitimate or unlawful:

- \*High-volume voice network traffic
- \*Large bursts of calls in a short timeframe
- \*Short duration calls
- \*Low average call duration
- \*Low call completion ratios
- \*Sequential dialing patterns
- \*Neighbor spoofing patterns

The Company knows all the carriers from which it receives traffic and has confirmed that all of the carriers are listed in the Robocall Mitigation Database. The Company is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers. If the Company has any reason to suspect illegal robocalling or spoofing is taking place over its network, the Company will work internally to identify the party that is using our network to originate, route, or terminate such calls and take appropriate action. The Company will either warn the customer to stop such practices or terminate their service as allowed per Company policy.

The Company does not have IP connectivity to the PSTN.

The Company does not send or receive VOIP calls to the PSTN.

The Company's voice subscribers are physically connected to the Company's central office by dedicated fiber or copper facilities and the addresses and identities of all subscribers are known.

The Company has a process in place to confirm the identity of new and renewing subscribers as part of the application for service or new service. The Company thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services.

The Company does not block emergency agency telephone numbers.

The Company does not sell voice services to international call originators.

The Company does not sell voice services to subscribers outside of its physical certificated area.

At the present time, the Company certifies that originating traffic is 100% non-IP and is not yet signed with Stir/Shaken.

A handwritten signature in cursive script, reading "Charlotte Pearce", written over a horizontal line.

Charlotte Pearce

Vice-President

Noxapater Telephone Company

601-726-7100

John Pearce is the President of BPM, Inc. and serves as the CEO of BPM, Inc. Charlotte Pearce is the Vice-President and has Managing Control of BPM, Inc. and its affiliate. Noxapater Telephone Company is an affiliate of BPM, Inc. and is wholly owned by John and Charlotte Pearce. Neither BPM, Inc. nor Noxapater Telephone Company have any additional subsidiaries or affiliates.