

Robocall Mitigation Plan

This robocall mitigation plan is for Pend Oreille Telephone Company ("Company"), with headquarters at 892 W. Madison Ave Glenns Ferry Idaho 83623.

Company will perform the following roles in the call chain:

- A voice service provider with a STIR/SHAKEN implementation obligation serving end-users

Company has not been prohibited from filing a certification in the Robocall Mitigation Database.

Company does not have a history of enforcement actions for illegal robocalls, TCPA or TSR violations, or related state law violations.

Company uses the following affirmative, effective measures to prevent the origination or transit of illegal robocalls.

Know Your Customer

Company follows the caller ID authentication best practices for vetting caller identity and operational legitimacy for new and existing customers as described by the NANC Call Authentication Trust Anchor Working Group.

This process includes the collection and review of entity-identifying information to confirm that Company has an authenticated relationship with the customer. Company uses this authenticated information to determine whether the customer is subject to any enforcement actions that restrict the type of calling that they may do, for example, if they have been banned from initiating telemarketing calls.

Company also validates, when possible, that the entity has a legitimate right to use its asserted calling numbers. Company uses this information to support the attestation level Company assigns to calls that Company originates for that customer.

Our contractual provisions with customers prohibit them from initiating illegal robocalls. If Company finds a customer initiating suspicious robocalls, Company warns them to stop. If such traffic continues, then Company terminates their service.

Know Your Upstream Provider

Company has a vetting and review process for upstream providers, that is, providers that send us voice traffic that Company terminates or transits to other providers.

Company confirms that the upstream provider has a certification in the Robocall Mitigation Database. Company will not accept voice traffic from an unregistered provider.

Company requires that upstream providers have a reasonable robocall mitigation plan, including a vetting process for their customers and upstream providers, and use call analytics to identify suspicious traffic.

Company establishes an understanding of the upstream provider's role in the call path for the traffic they will send to us, for example, whether they are acting as an originating voice service provider, a foreign intermediate provider, or a U.S.-based intermediate provider. Company uses this information to understand whether Company will be obligated to authenticate unsigned traffic that Company receives from them.

Company's contractual provisions with upstream providers prohibit them from sending us illegal robocalls. If Company finds that an upstream provider is sending us suspicious robocalls, Company will warn them to stop. If such traffic continues, then Company will terminate their service.

Traceback

Company will respond within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium. Company cooperates fully with such entities in investigating and stopping any illegal robocallers that use our service to originate, carry, or process illegal robocalls.

Robocall Mitigation Program

Company uses 'call analytics software' provided by TransNexus to monitor all outbound voice traffic in real-time to prevent the origination or transit of illegal robocalls.

The software provides detailed reporting to identify suspected illegal robocalls. The system alerts if Company processes outbound calls where the calling number has a poor reputation or is invalid, unallocated, or on a Do Not Originate list.

Company performs the same mitigation steps for all outbound calls regardless of our role in the call chain for a particular call.

Company immediately investigates any identified suspicious calls to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls. If Company determines that the traffic was likely unlawful, then Company will warn them to stop sending such traffic. If they continue to send traffic that appears to be unlawful, then Company will terminate their service.

STIR/SHAKEN

Company are exempt from STIR/SHAKEN implementation requirements for some calls because these calls rely on non-IP technology - 47 CFR 64.6304(d).