

Phillips County Telephone Company d/b/a PC Telcom Robocall Mitigation Plan

This Robocall Mitigation Plan describes the specific reasonable steps that Phillips County Telephone Company d/b/a/ PC Telcom has taken to avoid the origination, carrying, or processing of illegal robocall traffic. PC Telcom provides voice services over a Voice over Internet Protocol (VoIP) platform that is hosted by a third party vendor and managed by PC Telcom.

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

PC Telcom has a “know-your-customer” policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. Although PC Telcom’s business customers generally do not generate a high volume of calls, were the 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. Specifically, 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.

In addition, PC Telcom's Customer Terms and Conditions Agreement contains a provision that allows for service termination in the event services are abused by customers. Section 5.2 of the PC Telcom's Terms and Conditions Agreement states:

The company may immediately discontinue service for misuse, fraudulent use, or any use that the company determines, in its reasonable judgement, negatively affects its system or other Customers' use of the Services or system, or is in violation of law, including, but not limited to unauthorized Caller ID spoofing, auto-dialing, or robocalling.

PC Telcom will not hesitate to enforce this policy if necessary.

Likewise, PC Telcom's service activation form for business customers contains the following:

Please note that Section 5.2 of PC Telcom's General Terms and Conditions states that "The company may immediately discontinue service for misuse, fraudulent use, or any use that the company determines, in its reasonable judgement, negatively affects its system or other Customers' use of the Services or system, or

is in violation of law, including, but not limited to unauthorized Caller ID spoofing, auto-dialing, or robocalling."

“Know-Your-Upstream Provider” Procedures

PC Telcom relies upon the “Know-Your-Upstream Provider” procedures of the third party partner that hosts the VoIP platform through which PC Telcom provides voice service. PC Telcom ensures that the third party partner exercises due diligence before accepting traffic from an upstream provider. The Operating Company Number (OCN) of PC Telcom is 2197.

PC Telcom acquires a Service Provider Code (SPC) token key from Iconectiv. This is in place to support the secure telephone identity-policy administrator (STI-PA) and is applied to our originating calls for authorization as calls proceed to our upstream provider. PC Telcom partners with a third party partner who is STI-PA approved, together we send authorized calls with the SPC token applied.

Use of Call Analytics Systems

PC Telcom receives a daily upload of call detail from its hosted VoIP platform provider into its local billing platform. An automated daily email notifies PC Telcom employees on call volume. If call volumes are normal, the report contains no information. If a call limit is reached (e.g. 250 calls per phone number), the relevant customer phone number(s) and number of calls are included in the report.

PC Telcom will review the analytics of traffic from phone numbers with a high volume of calls using call log data to see if anything appears peculiar. If there appears to be a legitimate reason for a customer's traffic spike (e.g. a natural disaster struck a nearby area that generated significant calling) then the investigation would be documented and closed.

If a customer's traffic spike generally matches a robocalling call pattern (e.g. short duration calls with low completion rates), then the customer would be presented with the call record details and asked for an explanation for the call volume.

- If the customer's explanation is viable and legitimate (e.g. customer was utilizing an outbound calling device to notify its customers of an upcoming outage; school district or business account call tree), then the case would be documented and closed.
- If the customer's explanation is questionable, then the customer would be reminded of PC Telcom's policy on illegal robocalling and advised that their account will be immediately terminated if another instance occurs without a fully justifiable explanation.
- If the customer is unwilling or unable to offer any reasonable explanation, then PC Telcom would investigate the calls further and terminate service if it is found that the customer used PC Telcom's service to make illegal robocalls.

In addition, PC Telcom customers can use a portal to block incoming phone numbers. Selective call acceptance is a feature customers have control over to allow or deny incoming calls. The hosted VoIP platform provider can also block unwanted voice and fax calls upon request from PC Telcom.

Commitment to Respond to Traceback Requests

PC Telcom 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 robocalls that use its services to originate, carry, or process illegal robocalls.