

Robocall Mitigation Compliance with TRACED Act

Date	Author/Title	Change Summary
February 24, 2026	Dan Mostert, IT/Network Manager	Update for compliance with the Sixth Report and Order

This mitigation plan is submitted on behalf of Delhi Telephone Company, an incumbent local exchange carrier, and its wholly owned subsidiary, DTC Cable, Inc., a provider of competitive local exchange services. Each company serves rural communities in the state of New York and share operations, including their respective Robocall Mitigation Plans and will be referred to as Delhi throughout this document.

I. Implementation and Extension Status

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

Delhi is eligible for the continuing extension of the STIR SHAKEN implementation deadline as a small voice service provider (§64.6304 (a)(2) that has non-IP portions within its network §64.6304(d).

Delhi is a member of NTCA who participates on the ATIS Non-IP taskforce working group which developed the (ATIS Solutions) non-IP call authentication solutions and serves as Delhi's third-party representative on the ATIS Non-IP taskforce working group

Status of STIR/SHAKEN Implementation

Delhi has implemented authentication and verification with STIR/SHAKEN voice traffic that originates and terminates on the IP portions of the company's network that supports SIP calls.

Delhi is using the Inteliquent/Neustar hosted solution to attach attestation to Delhi calls utilizing a certificate issued to Delhi and hosted by TransUnion.

II. Robocall Mitigation Plan

Delhi is a voice service provider and all calls that originate on its network are subject to the company's robocall mitigation plan. Delhi uses Call Analytics and Know Your Customer to prevent the origination of robocall traffic on its network.

All carriers to which Delhi are connected appear on the Robocall Mitigation Database and their traffic is subject to the same mitigation plan as that of Delhi end users.

Analytics

Through its partnership with Inteliquent, Delhi's traffic delivered to Inteliquent as SIP is analyzed by Inteliquent for robo call violations. Any such traffic identified is suspended by Inteliquent and referred to Delhi for remediation.

Delhi is actively exploring options for additional network monitoring within its TDM network to allow it to flag call patterns indicative of potential illegal robocalling.

Know Your Customer

Delhi utilizes the mitigation technique of “Know Your Customer.” Delhi is a small long established provider that maintains a close relationship with its subscribers. Its customers are generally “mom and pop” users and few of its total customer base have enough call paths to generate the high volume of traffic associated with robocalling allowing us to use targeted in-house analytics to monitor, alert and apprehend suspected robocalling activities.

Delhi has set a call path level based on its average customer size. The level – referred to as “large volume calling capability” – is subject to change.

Delhi has a screening for new customers requesting service at or above large volume calling capability levels:

- We will not deploy large volume calling capability as a residential service or at an address shown in the company records as being residential
- Businesses requesting large volume calling capability must provide a tax ID and verification as to the nature of the business
- We verify addresses to look for overlapping / multiple deployed voice path subscriptions
- A Delhi representative may visit the premise of the business to verify the number of users at the location is appropriate for the volume of calling

Those few long-time business end users with large volume calling capability have been directly contacted by Delhi regarding the prohibitions on robocalling.

Prohibition Against Illegal Robocalling

Delhi end user services are subject to restrictions contained in its Acceptable Use Policy (“AUP”) found on the website of Delhi. The AUP specifically prohibits customers/subscribers from engaging in illegal robocalls. End users who purchase telephone services are required to sign an application that includes a contractual obligation requiring compliance with the AUP, including any revisions that may be implemented upon notice. Failure to comply with the AUP allows the telephone services of the end user to be terminated.

III. Traceback and Enforcement Cooperation

Delhi will actively participate the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG). Delhi commitments to respond within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium and will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

IV. Additional Certifications

Neither Delhi nor any entity which shares common ownership, management, directors, or control has been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.