

Robocall Mitigation Plan

This robocall mitigation plan is for New Lisbon Telephone, Inc. and dba New Lisbon Broadband and Communications, llc. with headquarters at 6369 E Dublin Pike, New Lisbon, IN 47366

We perform the following roles in the call chain:

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

NEW LISBON TELEPHONE, INC. has not been prohibited from filing a certification in the Robocall Mitigation Database.

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

NEW LISBON TELEPHONE, INC. uses the following affirmative, effective measures to prevent the origination or transit of illegal robocalls.

Know Your Customer

We follow 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.

We also validate, when possible, that the entity has a legitimate right to use its asserted calling numbers. We use this information to support the attestation level we assign to calls that we originate for that customer.

We physically install fiber to the premise and install and test the phone lines to know the customer is legitimate.

Traceback

We respond within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium. We cooperate 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

We use 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 us if we process outbound calls where the calling number has a poor reputation or is invalid, unallocated, or on a Do Not Originate list.

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

We immediately investigate any identified suspicious calls to determine if the caller was attempting to originate or transit unlawful robocalls. If we determine that the traffic was likely unlawful, then we warn them

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to stop sending such traffic. If they continue to send traffic that appears to be unlawful, then we terminate their service.

STIR/SHAKEN

We have registered with the STI-PA using OCN 0796 and OCN 663H. We have our own STIR/SHAKEN certificate issued by the TransNexus Certification Authority (STI-CA) that we use when authenticating calls we originate. We have implemented a STIR/SHAKEN solution supplied by TransNexus.

We have implemented Out-of-Band SHAKEN for calls that rely on non-IP technology using a STIR/SHAKEN solution supplied by TransNexus.

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

Submitted by:

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New Lisbon Telephone
New Lisbon Broadband and Communications