

ROBOCALL MITIGATION PLAN

Lennon Telephone Company is a small/rural carrier eligible for the STIR SHAKEN extension granted to small voice service providers with fewer than 100,000 voice subscriber lines under 47 CFR § 64.6304.

Lennon Telephone Company has implemented the following Robocall Mitigation Plan to detect and prevent unlawful robocalls from originating on its network.

All calls that originate on Lennon Telephone Company's network are subject to the described robocall mitigation program.

Robocall Mitigation Plan

Lennon Telephone Company has contracted with a vendor (**Neustar**) to provide robocall analytics and reputation scoring of our network's outbound traffic. The vendor's analytics identify patterns of suspected illegal robocalls and scores the calls based on their behavior and/or their status as suspected robocalls as reported to the Federal Communications Commission (FCC), Federal Trade Commission (FTC), and as reported by other carriers. Lennon Telephone Company has access to the vendor's portal and receives daily notifications about telephone numbers originating suspected illegal robocalls on its network, including from unassigned, inactive and do-not-originate TNs. Lennon Telephone Company also receives reports via e-mail alerts if any of its numbers experience a change in reputation such as suspicious traffic patterns or other detected anomalies outside the normal behaviour of our company's traffic. Lennon Telephone Company will examine the reports and investigate and identify the source of the calls as unlawful or legitimate.

Enforcement

If it is determined a Lennon Telephone Company customer is originating prohibited unlawful robocalls on our network, Lennon Telephone Company will either warn the customer to stop or terminate their service as allowed per Lennon Telephone Company policy.

Traceback

Lennon Telephone Company is committed to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to originate calls.

Know your Customer

Lennon Telephone Company has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Lennon Telephone 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.