



Robocall Mitigation Plan

This robocall mitigation plan is for QCOL, Inc (QCOL). , with headquarters at 213 Main Street, Markleysburg, PA 15459.

We perform the following roles in the call chain:

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

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

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

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

Know Your Customer

Being a small and rural wire line VoIP provider, QCOL has direct interaction with all QCOL subscribers at the time of service installation and does not provide virtual or remote services to any customers that are not known or vetted by QCOL.

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.

QCOL's acceptable use policies do not permit robocalls originating from the QCOL network by any subscriber.

QCOL does not offer any services that engage large volumes of outbound calls.

QCOL does not sell voice services to international call originators

QCOL maintains appropriate call logs to investigate, confirm, preserve and react to robocall violations.

If QCOL identifies, has reason to suspect, or is notified of traffic patterns consistent with illegal robocalls or spoofing, QCOL seeks to identify the party that it is using the network to originate, route, or terminate these calls and takes appropriate action.

Appropriate action may include:

- a) Validating that the originating party is authorized to use the originating telephone number.
- b) Notifying the registered subscriber of the originating telephone number that inappropriate activity may have occurred.
- c) Suspending the calling party's ability to originate, route, or terminate calls on QCOL's network.

Know Your Upstream Provider

We have a vetting and review process for upstream providers, that is, providers that send us voice traffic that we terminate or transit to other providers.

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

We require 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.

We establish 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. We use this information to understand whether we will be obligated to authenticate unsigned traffic that we receive from them.

Our contractual provisions with upstream providers prohibit them from sending us illegal robocalls. If we find that an upstream provider is sending us suspicious robocalls, we warn them to stop. If such traffic continues, then we terminate their service.

QCOL works closely with intermediate carriers which are certified and which have implemented their own STIR SHAKEN or Robocall Mitigation Program.

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 or upstream provider was attempting to originate or transit unlawful robocalls. If we determine that the traffic was likely unlawful, then we warn them 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 311H. 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.