

FARMERS TELECOMMUNICATIONS CORPORATION ROBOCALL MITIGATION PLAN

Farmers Telecommunications Corporation (Farmers), Operating Company Number (947D), is complete STIR SHAKEN. Farmers has upgraded its entire network to allow for the initiation, maintenance, and termination of SIP calls and fully implemented the STIR/SHAKEN framework.

Farmers is registered with the Policy Administrator and is an authorized provider in the STIR|SHAKEN ecosystem. Farmers has contracted with Toly Digital to sign all IP calls that originate on its network with the Farmers token. Farmers provides Toly the attestation level to apply to all Farmers originating IP calls.

Robocall Mitigation Plan

All voice traffic that originates on Farmers' network is subject to the following Robocall Mitigation Plan.

Farmers has contracted with TNS to provide robocall analytics and reputation scoring on all of its network's outbound traffic. TNS' analytics will 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. Farmers has access to the TNS portal and receives notifications about telephone numbers originating suspected illegal robocalls on its network, including unassigned, inactive and do-not-originate TNS. Farmers also receive 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 behavior of our company's traffic.

Investigation

Farmers examines the TNS call analytics reports and investigates and identifies the source of any calls flagged as unlawful or not legitimate.

In addition, if Farmers has any other reason to suspect illegal robocalling or spoofing is taking place over its network, Farmers will work internally to identify the party that is using our network to originate, route, or terminate such calls and take appropriate action.

Enforcement

Illegal robocalls and fraudulent spoofing is prohibited on Farmers network. If it is determined a Farmers customer is using our network to fraudulently spoof calls or to originate illegal robocalls, Farmers will either warn the customer to stop such practices or terminate their service as allowed per Farmers policy.

Know your Customer

Farmers has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Farmers 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. Farmers also requires a photo ID for all new customers requesting voice service.

All Farmers customers sign a service agreement / application before new service is activated, or existing service is renewed. The service arrangement/ application includes notice that Farmers prohibits use of its network for the initiation of fraudulent spoofing and robocalls and if end users are found in violate of the service terms, the end user's service may be terminated.

Upstream Provider Knowledge

Farmers knows all the carriers from which it receives traffic and has confirmed that all its connected carriers are listed in the Robocall Mitigation Database.

Farmers has also reviewed the connected carrier's RMPs to learn how the carriers monitor their originating traffic to mitigation illegal robocalls.

Farmers does not directly receive traffic from any foreign originating or intermediate provider. No provider is using Farmer's network to carry or process a high volume of illegal traffic.

In addition, Farmers is now incorporating traceback and prohibited traffic language in all new contractual agreements with upstream carriers.

Traceback

Farmers commits 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. Farmers will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium within twenty-four (24) hours.

Robocall Mitigation Database Eligibility

Farmers has not been involved in any formal law enforcement or regulatory investigation into suspected unlawful robocalling. Farmers has not been prohibited from filing in the Robocall Mitigation Database (RMD).

Customer Education

Farmers posts information on its website to educate customers on how to protect themselves from becoming victims of unlawful robocalls and a process to report complaints related to robocall activity.