

Ardmore Telephone Company ROBOCALL MITIGATION PLAN (RMP)

This report describes the practices and procedures Ardmore Telephone Company (Ardmore) has in place to mitigate illegal robocalls. Ardmore may modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time in order to respond to changes in its business, its capabilities and its needs.

STIR/SHAKEN Continuing Extension

Ardmore Telephone Company - OCN 0280 - is eligible for the continuing extension of the STIR SHAKEN implementation deadline under FCC rules §64.6304(a)(2) and §64.6304(d).

Ardmore qualifies 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).

Ardmore provides local service to fewer than 100,000 voice subscriber lines. The majority of Ardmore customers are served on the non-IP portions of Ardmore's network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls. In addition, Ardmore's non-IP network is connected to carriers that do not support IP connectivity; therefore, Ardmore cannot upgrade the Non-IP connections to IP connectivity.

Ardmore also originates calls via SIP connections within its network. Ardmore has registered with the Policy Administrator and is an authorized service provider in the STIR|SHAKEN ecosystem. Ardmore has implemented STIR|SHAKEN within its IP-network and signs all calls originating on Ardmore's IP-network with the Ardmore certificate.

In addition, Ardmore has contracted with a third-party carrier to provide numbering for assignment to some Ardmore customers. Ardmore and the third-party carrier connect via SIP. The third party signs the originating calls with our certificate. The third party provides robocall mitigation on these originating calls.

ROBOCALL MITIGATION PLAN

This Robocall Mitigation Plan describes the specific measures that the Company has implemented to detect and prevent illegal robocalls on its network. The Company will periodically evaluate the risks it faces, the effectiveness of its policies and procedures, and its capabilities to support the measures described.

Risk Assessment. Ardmore is a voice service provider offering a variety of voice calling services. Its customers generally do not originate high volume calls and Ardmore has not

received information suggesting that robocalls are originated on its network. Therefore, Ardmore does not consider its network at high risk of originating illegal robocalls.

SPECIFIC MEASURES TO IDENTIFY AND PREVENT ILLEGAL ROBOCALLS

Know Your Customer : Customer Due Diligence: Ardmore conducts due diligence on new and renewing customers, confirming the customer's identity and, if it is a business, is incorporation documents. The Company confirms the customer's service address for all customers.

- Ardmore verifies customer's credit history and business reputation prior to providing service.
- Ardmore verifies customer information when contracts are renewed or services are added.
- Ardmore verifies the customer's identity and their right to use the telephone number presented on calls.
- Ardmore has the policies that define the circumstances by which it will deny, suspend or terminate service to a customer.

Upstream Providers

Ardmore knows all the carriers from which it receives traffic.

Ardmore has confirmed that all carriers in which Ardmore exchanges traffic and from which Ardmore receives traffic are listed in the Robocall Mitigation Database. Historically, most interconnection agreements Ardmore has with its competitors includes a commitment to follow the FCC's traceback rules. Going forward, all interconnection agreements will include prohibited traffic and traceback language.

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

Measures to Prevent or Avoid the Origination of Illegal Robocalls

- Ardmore has in place an enforceable terms of use and/or an acceptable use policy. Ardmore also has in place policies designed to detect and prevent fraudulent traffic on its network.
- Ardmore uses TNS Call Guardian analytics technologies and services to monitor traffic on its network and identify potentially unlawful call origination activity.

Enforcement

- If Ardmore has a reasonable basis to believe that a customer is originating illegal robocalls or if a pattern of questionable activity is detected, it will require the customer to remedy the problem. If effective action is not taken by the customer, Ardmore will suspend and/or terminate service to the customer.
- Ardmore blocks, by default, calls from telephone numbers in which subscribers have directed the company to add to the Do Not Originate list as well as invalid numbers. Ardmore also blocks calls scored as a -4 (worst reputation/category) by the TNSi Universal Call Block Feature.

Responding to Traceback Requests

Ardmore has designated an individual as a dedicated point of contact for addressing traceback requests, and a backup person to that individual. It either has provided the ITG with the contact information and business hours for those individuals, or will do so upon receipt of the first request from the ITG. See <https://www.ustelecom.org/the-industry-traceback-group-itg/for-providers/>

Ardmore will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium within 24 hours.