
OTZ Telephone Cooperative, Inc., (the Company) (FRN 0005373576) has implemented a Robocall Mitigation Program, required by Section 4(b)(5)(C) of the TRACED Act, and 47 C.F.R. §64.6305, as documented herein. The Company is a rural local exchange carrier operating in the state of Alaska and is operating under the extension contained in 47 C.F.R. §64.6304 applicable to small voice providers (The Company serves 100,000 or fewer voice service access lines).

The Company's Robocall Mitigation Program includes, but is not limited to, the following:

1. The Company maintains a rigorous "know your customer" process, specifically designed to prevent new and renewing customers from using its network to originate illegal calls. The Company investigates new and renewing customers seeking access to high-volume origination services and, if necessary and possible, modifies service terms and conditions to mitigate the potential of any new or renewing customer originating illegal robocalls.
2. The Company has processes in place to ensure it responds fully to any traceback request from the FCC, civil or criminal law enforcement agents, and the industry traceback consortium in a timely manner. The Company has designated a traceback response contact(s) who are aware of the traceback requirements contained in 47 C.F.R. §64.1200(n)(1) and the obligations contained in 47 C.F.R. §64.1200(n)(2) in the event The Company receives notification of a traceback request.
 - a. Upon receipt of any traceback request, The Company will take steps to promptly investigate the traffic, and if a notice is received as outlined in FCC rules, will also take steps to effectively mitigate the illegal traffic.
 - b. If the Company determines that the identified traffic is not illegal, it will provide an explanation in the report it submits to authorities as to how the Company reached this conclusion.
 - c. If the Company determines that the identified traffic came from another voice provider with direct access to the United States public switched telephone network, the report will identify that voice service provider and the notified voice service provider should take mitigation steps if possible, or
 - d. If the Company does not reach either of these conclusions (b or c above), its report will include the steps it will take to effectively mitigate this traffic.
3. The Company analyzes high-volume voice traffic to identify and monitor patterns consistent with robocall campaigns.
4. The Company analyzes traffic for patterns indicative of fraudulent calls – e.g., identify short duration calls with low completion rates.
5. If the Company detects a pattern consistent with illegal robocalls, or otherwise has reason to suspect illegal robocalling or illegal spoofing is taking place over its network, The Company will seek to identify the party that is using its network to originate, route, or terminate these calls and take appropriate action.
 - Taking appropriate action may include, but is not limited to, initiating a traceback investigation, verifying that the originating commercial customer owns or is authorized to use the Caller ID number, determining whether the Caller ID name sent to a receiving party matches the customer's corporate name, trademark, or d/b/a name, terminating or suspending the party's ability to originate, route, or terminate calls on its network, or notifying law enforcement authorities.