



Robocall Mitigation Program – February 2024 Update

Pine Drive Telephone Company (“Company”) is a voice service provider with a STIR/SHAKEN implementation obligation serving end-users in and near the town of Beulah, Colorado.

The Company will, by legal request, respond to all traceback requests originating from the Federal Communications Commission (FCC), law enforcement, and the industry traceback consortium within 24 hours of notification, as well as cooperate with said entities in the quick investigation and cessation of any entities that use its service to originate illegal robocalls.

The Company’s prior certification has not been removed by any Federal Communications Commission (“Commission”) action, nor has the Company been prohibited from filing in the Robocall Mitigation Database (“RMD”) by the Commission. The Company has not been subject to any Commission action regarding illegal robocalls and/or call spoofing within the last two years.

The Company is 100% owned by domestic persons and there are no foreign entities with any ownership interests in the Company.

In 2021, the Company began the process of migrating those portions of its networks that are IP-based to STIR/SHAKEN and that was completed in the first quarter of 2023 in accordance with 47 CFR § 64.6301(a)(1) and (2). Outbound toll calls as well as some inbound toll traffic not passing through legacy TDM tandem switches in transit are subject to STIR/SHAKEN scrutiny and will be rejected by our upstream provider if they do not pass STIR/SHAKEN tests for legitimacy. Legacy TDM trunks, tandems, and switches constitute “non-IP networks” as written in 47 CFR § 64.6304(d); all traffic passing through these non-IP networks are therefore subject to a continuing extension. Plans to continue to upgrade all portions of the network to IP are completely dependent on these non-IP network providers that continue to use legacy switching technologies in their networks which make it cost-prohibitive to attempt to deploy forms of STIR/SHAKEN using methods that may or may not end up being reliable. The Company complies with the requirements of 47 CFR § 64.6303(a) in these portions of the network utilizing non-IP technologies.

In the meantime, and since not all portions of its network are IP-based, the Company continues to take the following steps to ensure the quick detection and termination of any subscribers that use the Company’s network to initiate illegal robocalls:

1. Addendums to the Company’s Terms of Service and service agreements to include illegal robocalls as a condition for automatic suspension and/or termination of services without warning;
2. Frequent sampling and monitoring of outbound call traffic through its switch, checking for large numbers of calls from a single number within its network often occurring at random times. Any individual originating numbers found to be initiating large quantities of calls will be investigated and immediately terminated if the outbound calling pattern meets various criteria for illegal robocalling, based mostly on frequency of calls, randomization of call destination, and time of day in which the calls occurred;
3. Continuing to know its customers and understanding that while the Company does not currently have any outbound call centers or any other larger businesses that often utilize legal robocalling methods in the normal course of business, such entities may arrive within its service area at any time or in any form. The Company will

remain committed to maintaining high levels of customer service while also remaining vigilant to detecting and stopping illegal robocalls originating from its network.

In 2023, the Company also enacted Terminating Call Manager, a service provided by Innovative Systems, which allows customers to have the option to subject all incoming calls to additional actions that prevent automated systems from being able to connect calls directly to the Company's end users. The service remains optional; given that many local entities such as hospitals and pharmacies use automated networks to contact their patients, incorporating this service system-wide poses a potential significant problem for many residents who rely on timely receipt of these messages for managing health concerns. The Terminating Call Manager service will be placed on any access line for no charge upon customer request.

The Company does not utilize any call analytic programs or services, instead relying on knowledge of its customer base and random sampling of traffic as stated in (2) above. However, the Company will continually remain cognizant of such services and will not hesitate to incorporate a call-analytic solution into its robocall mitigation program if the need arises.

Please direct any questions to Matt Sellers, General Manager, at 719-485-3400 or via email at matt@pinedrivetel.com.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Matt Sellers', with a long horizontal flourish extending to the right.

Matthew R. Sellers
General Manager
February 19, 2024