



LaHarpe Telephone Company Inc.

***109 W 6th Street
LaHarpe, KS 66751
620-496-2291
620-496-2491 FAX***

**La Harpe Telephone Company, Inc.
Robocall Mitigation Program**

This Robocall Mitigation Plan describes the specific reasonable steps that LaHarpe Telephone Company, Inc. (“LaHarpe”) has taken to avoid the origination, carrying, or processing of illegal robocall traffic. LaHarpe’s voice service is provided via Toly Digital Networks, Inc.’s Cloud Switch Services. Toly Digital Networks performs all switching operations for LaHarpe’s voice service. Therefore, LaHarpe does not have control over the network infrastructure necessary to implement STIR/SHAKEN. Implementation of the STIR/SHAKEN framework for LaHarpe’s voice customers is performed by Toly Digital Networks and their partner, TransNexus.

Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Robocalls

LaHarpe has a “know-your-customer” policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. Specifically, LaHarpe follows the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group.

LaHarpe’s business customers are all small businesses, with most physically located in our service territory. Prior to a new business customer ever making a call, we personally know, or get to know, the business owners and/or management. This personal touch gives LaHarpe a clear view of whether the business is a risk for originating illegal robocalls.

LaHarpe has never received a request for high-volume origination services. However, were LaHarpe to ever receive such a request, we would exercise caution and extensively investigate the requesting entity prior to granting access to the service. In particular, we would collect information such as their physical business location, contact person(s), state or country of incorporation, federal tax ID, and the general nature of their business.

“Know-Your-Upstream Provider” Procedures

LaHarpe relies upon the “know-your-upstream provider” procedures of Toly Digital Networks, whose Cloud Switch Services LaHarpe uses to offer voice service. LaHarpe is confident that Toly Digital Networks exercises due diligence before accepting traffic from an upstream provider.



LaHarpe Telephone Company Inc.

***109 W 6th Street
LaHarpe, KS 66751
620-496-2291
620-496-2491 FAX***

Use of Call Analytics Systems

Toly Digital Networks partners with TransNexus to monitor LaHarpe's outbound voice traffic in real time to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts us if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database, or has a poor reputation. LaHarpe immediately investigates any identified calls to determine if the caller was attempting to originate unlawful robocalls. If we determine that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as appropriate. Additionally, LaHarpe provides its customers tools to utilize STIR/SHAKEN information, as well as other filters, to help identify and screen potential incoming robocalls.

Commitment to Respond to Traceback Requests

LaHarpe commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its services to originate, carry, or process illegal robocalls.