



Viola Home Telephone Company

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Robocall Mitigation Plan Description for Viola Home Telephone Company

STIR/SHAKEN Extensions:

Viola Home Telephone Company has received the following extensions of the STIR/SHAKEN implementation deadline under §64.6304 of the FCC's rules: (1) the small voice service providers extension (§64.6304(a)), and (2) the non-IP networks extension (§64.6304(d)). All originating calls on the VIOLA HOME TELEPHONE COMPANY network are subject to the Robocall Mitigation Program measures described below.

Trace Back Requests:

Viola Home Telephone Company commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that are discovered using our service to originate calls.

Robocall Mitigation Measures:

Viola Home Telephone Company works with a 3rd party vendor to perform monitoring of originating call volumes by our customer base. Originating call records are summarized and compared to previous volumes to check for large increases in call volumes that appear unreasonable. If such volume changes are discovered, the company will investigate the change and take appropriate action with the customer.

Status of VIOLA HOME TELEPHONE COMPANY STIR/SHAKEN Implementation:

As of June 30, 2023, none of the voice traffic that originates or terminates on the network of Viola Home Telephone Company is authenticated or verified with STIR/SHAKEN. Viola Home Telephone Company has received a non-IP networks extension under §64.6304(d) of the FCC's rules, which provides the company with a continuing extension of the STIR/SHAKEN implementation

deadline for those portions of its network that cannot initiate, maintain, and terminate SIP calls. By June 30, 2023, Viola Home Telephone Company has now begun authenticating and verifying with STIR/SHAKEN voice traffic that originates and terminates on the IP portions of the company's network that support SIP calls.

At any future point where the company implements IP-based trunking for voice traffic, the IP-based trunking will be fully Stir/Shaken compliant upon implementation.

In addition, Viola Home Telephone Company will implement a call authentication protocol for voice calls delivered over the non-IP portions of its network that do not use SIP technology when such a protocol is fully developed and finalized by industry standards and the necessary equipment and software is available on the commercial market.

Viola Home Telephone Company Primary Contact For Robocall related issues:

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