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Comcell, Inc.'s and Community Telephone Company, Inc.'s (collectively, CTC's) Robocall Mitigation Program

The following is CTC's Robocall Mitigation Program.

STIR/SHAKEN

CTC has successfully deployed Secure Telephone Identity Revisited (STIR) and Signature-based Handling of Asserted Information Using Tokens (SHAKEN), demonstrating adherence to industry standards ATIS-1000082, RFC8224, RFC8225, and RFC8226. Robo calls are mitigated by nuisance and fraud scores from the certificate repository, and any calls that are above the threshold are blocked.

Robocall Mitigation

All voice traffic that originates on our network is subject to the robocall mitigation program, preventing potential robocall perpetrators from utilizing the CTC network in a manner forbidden by law.

Call Analytics

Calls are monitored through Ribbon's Call Trust Identity Hub Manager. Calls are being executed by Nuisance Score and Fraud Score from the Service Provider Key Management Service (SP-KMS) and Secure Key Store (SKS). CTC investigates calls identified by Ribbon as suspicious calls or those that have abnormal call volumes, patterns or activity consistent with illegal robocalls.

In addition, if CTC has any other reason to suspect illegal robocalling or spoofing is taking place over its network, CTC will work internally to identify the party that is using our network to originate, route, or terminate such calls and take appropriate action.

Illegal robocalls and fraudulent spoofing is prohibited on our network. If it is determined a CTC customer is using our network to fraudulently spoof calls or to originate illegal robocalls, CTC will either warn the customer to stop such practices or terminate their service as allowed per CTC policy.

Know your Customer

New connections for voice access lines are sufficiently low, enabling customer service staff to effectively vet new customers. CTC has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. CTC thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services.

Upstream Provider Knowledge

CTC knows all the carriers from which it receives traffic and has confirmed that all the carriers are listed in the Robocall Mitigation Database. No provider is using CTC's network to carry or process a high volume of illegal traffic. CTC monitors incoming traffic from all connected carriers for suspicious call patterns indicative of illegal robocall activity. The connected carriers are made aware of any suspicious or illegal traffic and are notified that, if the traffic does not cease, the calls may be blocked from entering CTC's network. In addition, CTC is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.

Traceback

CTC is committed to responding to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and cooperating with such entities in investigating and stopping any illegal robocallers from utilizing our services. CTC commits to respond to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within twenty-four (24) hours.