



This Robocall Mitigation Plan is applicable to the following companies:

Twin Valley Telephone, Inc.
Twin Valley Communications, Inc.
The Southern Kansas Telephone Company, Inc.
SKT, Inc.

Hereinafter referred to as 'Twin Valley'

STIR/SHAKEN Implementation

Twin Valley, headquartered in Miltonvale, Kansas offers voice and Internet services. As of June 2021, Twin Valley has under 5000 access lines with voice call traffic travelling over a combination of SIP and TDM trunks, and therefore qualifies for an extension from the TRACED Act requirements to implement STIR/SHAKEN until June 30, 2023, under 47 C.F.R. §64.6304(a).

Robocall Mitigation Plan

This Robocall Mitigation Plan describes the specific measures that Twin Valley has implemented to detect and prevent illegal robocalls on its network as of June 30, 2021. Twin Valley will periodically evaluate the risks it faces, the effectiveness of its policies and procedures, and its capabilities to support the measures described. Should we determine that changes are appropriate, its practices may differ from those described below.

Risk Assessment

- Twin Valley customers generally do not originate high volume calls and we have not received information suggesting that robocalls are originated on our network. Therefore, Twin Valley does not consider its network at high risk of originating illegal robocalls.

Customer Due Diligence

- Twin Valley conducts due diligence on new customers when they sign up for service to determine if they will be originating high call volumes.
- Twin Valley confirms the customers service address for all new and existing customers when contracts are renewed, or services are added.
- All residential and business lines are only able to place one call at a time.
- Residential and business lines are only able to place calls originating from their own phone number.
- Only numbers residing in Twin Valley's switch are assigned to residential and business lines.
- Caller ID and call records are reviewed when the service is installed to verify legitimate caller ID information.





Measures to Prevent or Avoid the Origination of Illegal Robocalls

- Twin Valley has in place an enforceable acceptable use policy. Twin Valley also has in place policies designed to detect and prevent fraudulent traffic on its network.
- Twin Valley uses Transaction Network Services (TNS) Call Guardian analytics technologies and services to monitor traffic on its network and identify potentially unlawful call origination activity. If Twin Valley has a reasonable basis to believe that a customer is originating illegal robocalls, it will require the customer to remedy the problem and, if effective action is not taken, Twin Valley can suspend and/or terminate service to the customer.
- Twin Valley blocks calls originating from invalid numbers per FCC Order [2017 Call Blocking Order]

Responding to Traceback Request

- Twin Valley will respond to inquiries received from the Industry Traceback Group within 24 hours. If a pattern of questionable activity is detected Twin Valley will require its customer to remedy the problem and, if effective action is not taken, service to the customer may be suspended and/or terminated.
- Twin Valley has designated an individual as a dedicated point of contact for addressing traceback requests, and a backup person to that individual. Twin Valley either has provided the ITG with the contact information and business hours for those individuals or will do so upon receipt of the first request from ITG.

Cooperation with State and Federal Regulators

- Twin Valley will cooperate with state and federal regulators to prevent any, and all, illegal robocalls. Specifically, Twin Valley will:
 - ✓ Respond to valid law enforcement requests.
 - ✓ Provide relevant non-proprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities; and
 - ✓ Implement mandated robocall mitigation procedures to the fullest extent possible with the goal of maximizing the mitigation of illegal robocalls.

Twin Valley has deployed call authentication, call labeling, and call blocking services provided by TNS. We have made great strides to protect our network and consumers from harmful calls. Twin Valley is pleased to play a role in that improvement and will continue the necessary work to protect our customers.

Parent Company: Twin Valley Management, Inc.

Principals:

Ben Foster – President
Bill McVey – Chief Operating Officer
John Sullivan – Vice President of Operations

Revised: December 5, 2024