



National Telephone of Alabama, Inc. 0286 Robocall Mitigation Plan

STIR/SHAKEN Extension

National Telephone Company is exempt from STIR/SHAKEN implementation requirements for all calls because the calls rely on non-IP technology - 47 CFR 64.6304(d). To meet the non-IP network criteria for the continuing STIR SHAKEN extension (§ 64.6303 (a)(2)), National Telephone Company is a member of NTCA. NTCA participates on the ATIS PTSC Non-IP Call Authentication Task Force working group which developed the (ATIS Solutions) non-IP call authentication solutions. NTCA is serving as National Telephone Company's third-party representative on the ATIS PTSC Non-IP Call Authentication Task Force working group.

National Telephone Company is a TEC company, the companies are registered with the STI-PA - under TEC of Jackson, Inc.- as authorized providers in the STIR SHAKEN eco-system. All IP originating calls are authenticated with the TEC of Jackson certificate.

All the voice traffic that originates on our network is subject to the robocall mitigation program described below.

Know Your Customer

We follow the caller ID authentication best practices for vetting caller identity and operational legitimacy for new and existing customers as described by the NANC Call Authentication Trust Anchor Working Group.

This process includes the collection and review of entity-identifying information to confirm that we have an authenticated relationship with the customer. We use this authenticated information to determine whether the customer is subject to any enforcement actions that restrict the type of calling that they may do, for example, if they have been banned from initiating telemarketing calls.

We also validate, when possible, that the entity has a legitimate right to use its asserted calling numbers. We use this information to support the attestation level we assign to calls that we originate for that customer.

Our contractual provisions with customers prohibit them from initiating illegal robocalls. If we find a customer initiating suspicious robocalls, we warn them to stop. If such traffic continues, then we terminate their service.

Traceback

We respond within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium. We cooperate fully with such entities in investigating and stopping any illegal robocallers that use our service to originate, carry, or process illegal robocalls.

Call Analytics

We use call analytics software provided by TransNexus to monitor all outbound voice traffic in real-time to prevent the origination or transit of illegal robocalls.

The software provides detailed reporting to identify suspected illegal robocalls. The system alerts us if we process outbound calls where the calling number has a poor reputation or is invalid, unallocated, or on a Do Not Originate list.

We perform the same mitigation steps for all outbound calls regardless of our role in the call chain for a particular call.

We immediately investigate any identified suspicious calls to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls. If we determine that the traffic was likely unlawful, then we warn them to stop sending such traffic. If they continue to send traffic that appears to be unlawful, then we terminate their service.

Upstream Provider Knowledge

We know all the carriers from which we receive traffic and have confirmed that all of the carriers are listed in the Robocall Mitigation Database.

We have also reviewed the connected carrier's RMPs to learn how the carriers monitor their originating traffic to mitigate illegal robocalls.

We do not directly receive traffic from any foreign originating or intermediate provider. No provider is using our network to carry or process a high volume of illegal traffic.

In addition, we are now incorporating traceback and prohibited traffic language in all contractual agreements with upstream carriers.

Company Name	Relationship to Filing Entity	Type of Company	% Owned by Filing Entity	Management or Control of Entity
National Telephone Company, Inc.	Affiliate	ILEC	0%	Joy Garner, CEO; Devin Simmons, President
Bay Springs Telephone Company, Inc.	Affiliate	ILEC	0%	Joy Garner, CEO; Devin Simmons, President
Crockett Telephone Company, Inc.	Affiliate	ILEC	0%	Joy Garner, CEO; Devin Simmons, President
Roanoke Telephone Company, Inc.	Affiliate	ILEC	0%	Joy Garner, CEO; Devin Simmons, President
Peoples Telephone Company	Affiliate	ILEC	0%	Joy Garner, CEO; Devin Simmons, President
West Tennessee Telephone Company, Inc.	Affiliate	ILEC	0%	Joy Garner, CEO; Devin Simmons, President
TECO of Jackson, Inc.	Affiliate	QLEC	0%	Joy Garner, CEO; Devin Simmons, President
LecNet, Inc.	Affiliate	Broadband Management	0%	Joy Garner, CEO; Devin Simmons, President
ComNet, Inc.	Affiliate	Tower Rental	0%	Joy Garner, CEO; Devin Simmons, President
Billing Operations Support	Affiliate	Billing & OSS Software Services	0%	Joy Garner, CEO; Devin Simmons, President
TECServices Cash Management	Affiliate	Cash Management Services	0%	Joy Garner, CEO; Devin Simmons, President
TECServices of Louisiana, Inc.	Affiliate	IT Consulting	0%	Joy Garner, CEO; Devin Simmons, President
USAccess, Inc.	Affiliate	Property Management	0%	Joy Garner, CEO; Devin Simmons, President
Telephone Electronics Company, Inc.	Parent	Holding Co	0%	Joy Garner, CEO; Devin Simmons, President