

Deerfield Farmers' Telephone Company

ROBOCALL MITIGATION PLAN

Deerfield Farmers' Telephone Company (Operating Company Numbers 0691: DEERFIELD FARMERS TEL. CO., 558A: DEERFIELD FARMERS TELEPHONE COMPANY, and 3459: TC3 TELECOM, INC) is a voice service provider that is subject to the Non-IP Network continuing extension of the STIR SHAKEN implementation deadline [47 CFR §64.6304(d)].

Deerfield Farmers' Telephone Company provides local service to fewer than 100,000 voice subscriber lines. All customers are served on the IP portion of Deerfield Farmers' Telephone Company's network. However, Deerfield Farmers' Telephone Company's existing interconnection trunks to Class-4 Tandems use TDM technology. The companies that manage these Tandems do not support migrating these TDM circuits to IP telephony. Therefore, these circuits rely on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

To meet the non-IP network criteria for the continuing STIR SHAKEN implementation extension [47 CFR § 64.6303 (a)(2)], Deerfield Farmers' Telephone Company is a member of the Rural Broadband Association (NTCA). NTCA participates on the ATIS Non-IP taskforce working group, which developed the (ATIS Solutions) non-IP call authentication solutions. NTCA is serving as Deerfield Farmers' Telephone Company's third-party representative on the ATIS Non-IP taskforce working group.

Deerfield Farmers' Telephone Company is also a Voice Service Provider that originates calls via SIP connections within its network. In accordance with 47 CFR §64.6301(a)(1), Deerfield Farmers' Telephone Company has registered with the Policy Administrator, obtained an SPC Token, used that token to obtain a Secure Telephone Identity certificate from the Certificate Authority, and is an authorized service provider in the STIR|SHAKEN ecosystem.

In accordance with 47 CFR §64.6301(a)(2)(ii), Deerfield Farmers' Telephone Company has implemented STIR|SHAKEN within its IP-network and signs the calls originating on the IP portions of Deerfield Farmers' Telephone Company's network.

Role In the Call Chain

Deerfield Farmers' Telephone Company is a voice service provider with a STIR/SHAKEN implementation obligation on the IP-Portions of its network. Deerfield Farmers' Telephone Company is also a voice service provider without a STIR/SHAKEN obligation on the Non-IP portions of its network because that portion of the network relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

Robocall Mitigation Plan [47 CFR §64.6305(a)(1)]

All voice traffic that originates on Deerfield Farmers' Telephone Company's network is subject to the following Robocall Mitigation Plan.

Under 47 CFR § 64.6305(d)(2)(ii), Deerfield Farmers' Telephone Company - as a voice service provider - is required to indicate (1) the specific reasonable steps the voice service provider has taken to avoid originating illegal robocall traffic as part of its robocall mitigation program, (2) including a description of how it complies with its obligation to know its customers pursuant to § 64.1200(n)(4), (3) any procedures in place to know its upstream providers, (4) and the analytics system(s) it uses to identify and block illegal traffic, including whether it uses any third-party analytics vendor(s) and the name(s) of such vendor(s)

(1) the specific reasonable steps the voice service provider has taken to avoid originating illegal robocall traffic as part of its robocall mitigation program,

Deerfield Farmers' Telephone Company utilizes Calling Party Number (CPN) verification screening to prevent our customers from originating illegal robocall traffic. Deerfield Farmers' Telephone Company verifies that each telephone number added to the customer's account is fully within the customer's control, and the customer is allowed to originate calls from the telephone number. Also, the Deerfield Farmers' Telephone Company network will only accept calls originating from customers if the Calling Party Number is associated with the customer's account.

(2) including a description of how it complies with its obligation to know its customers pursuant to § 64.1200(n)(4)

In compliance with 47 CFR §64.1200(n)(4), Deerfield Farmers' Telephone Company has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Deerfield Farmers' Telephone Company thoroughly vets new residential and business customers by collecting personally identifiable information for additional security on each account before activating new services or making changes to existing services.

Residential customers are required to provide their full name, address (physical and mailing, if different), Social Security number, phone number, email, and, optionally, to establish a security question. Residential customers are also subject to a credit history check.

Business customers are required to provide their full company name, tax identification number, address (physical and mailing, if different), business phone number, and email address. Authorized representatives of the business are asked to provide their full name, phone number, and email.

To initiate an account change, the person requesting the change must be a previously authorized representative of the account. If this is not the case, the D&P Customer Service Representative will contact the account holder using the contact information they provided at account setup to determine if the person requesting the change should become an authorized representative of the account.

(3) any procedures in place to know its upstream providers,

In compliance with 47 CFR §64.6305(d)(2)(ii), Deerfield Farmers' Telephone Company knows all carriers from which it receives voice traffic and has confirmed that all of the carriers are listed in the Robocall Mitigation Database. Deerfield Farmers' Telephone Company has also reviewed the connected carrier's RMPs to learn how the carriers monitor their originating traffic to mitigate illegal robocalls.

In addition, Deerfield Farmers' Telephone Company is now incorporating traceback and prohibited traffic language in all contractual agreements with upstream carriers.

(4) and the analytics system(s) it uses to identify and block illegal traffic, including whether it uses any third-party analytics vendor(s) and the name(s) of such vendor(s)

Internal Call Monitoring

Deerfield Farmers' Telephone Company has monitoring and reporting systems in place to analyze voice traffic volume. Our monitoring systems provide alerts on calling patterns with unusual spikes or, traffic patterns.

Vendor Call Analytics

Deerfield Farmers' Telephone Company uses Neustar's Certified Caller and Robocall Mitigation solutions.

The functionality of Neustar's products include:

- Each call is assessed through the Neustar model, leading to a constantly refreshed view of call behavior and probability of a given number currently being used for robocalling.
- Active numbers are assessed by the model for behavioral attributes typically associated with robocalling including:
 - Neighbor spoofing events
 - Sudden spikes in volume, such as driven by call spoofing
 - Do-Not-Originate (DNO) numbers are also deemed to be robocalls if they are the calling party number. This is sourced from industry (e.g., US Telecom) and directly from enterprises.
 - Calls originating from the Deerfield Farmers' Telephone Company network (i.e., Robocall Protection)
 - The service covers both US domestic and international TNs.
- Supports a real-time query to service to determine if a number originating on your network could be a robocall. Such calls can be blocked, or the terminating party can be notified via CNAM.
- For each new instance of robocalling using the Operating Service Provider (OSP) TNs, an alert is sent to the OSP in near real-time. This alert will result in the OSP (manually) blocking the TN and all TSPs being alerted via CNAM, through an overlay such as "ROBOCALLER". The CNAM alerting helps address instances of spoofing of TNs that are not going through the OSP that owns the number.

- Real-time query to determine if a number terminating on our network could be a robocall. This protects subscribers from calls that come from networks that cannot authoritatively attest to the end user caller
- Terminating calls that Neustar's service suspect to be fraudulent have their CNAM altered to inform the terminating user, allowing them to decline the call or block based on the altered CNAM.

Investigation & Enforcement

If Deerfield Farmers' Telephone Company's internal monitoring detects a pattern consistent with illegal robocalls, or we have reason to suspect illegal robocalling or spoofing is taking place over our network, we will seek to identify the party that is using our network to originate, route, or terminate these calls. and take appropriate action.

Appropriate action may include:

- Validating that the originating party is authorized to use the TN.
- Suspending the calling party's ability to originate, route, or terminate calls on Deerfield Farmers' Telephone Company's network.

If the Neustar platform detects suspected robocalling patterns, Deerfield Farmers' Telephone Company will take appropriate action which may include suspending or terminating the subscriber.

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

Traceback [47 CFR §64.6305(a)(2)], [47 CFR §64.6305(d)(2)(iii)]

In compliance with 47 CFR §64.6305(a)(2), and 47 CFR §64.6305(d)(2)(iii), Deerfield Farmers' Telephone Company commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to originate calls. Deerfield Farmers' Telephone Company will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium fully and in a timely manner within twenty-four (24) hours.

Robocall Mitigation Database Eligibility [47 CFR §64.6305(d)(2)(iv)]

In compliance with 47 CFR §64.6305(d)(2)(iv), Deerfield Farmers' Telephone Company has not been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling.

Deerfield Farmers' Telephone Company has not been prohibited from filing in the Robocall Mitigation Database (RMD).

Principals, Affiliates, Subsidiaries, and Parent Companies

Deerfield Farmers' Telephone Company and TC3 Telecom, Inc. are wholly owned by D & P Communications, Inc.

Robert Parisien is the President of D & P Communications, Inc. Robert Parisien also serves as CEO of D & P Communications, Inc. Robert Parisien is the President of Deerfield Farmers' Telephone Company. Robert Parisien serves as CEO of Deerfield Farmers' Telephone Company.

D & P Communications, Inc. has the Managing Control of Deerfield Farmers' Telephone Company and all its affiliates and subsidiaries. TC3 Telecom, Inc. is a subsidiary of Deerfield Farmers' Telephone Company, the filing entity. TC3 Telecom, Inc. is an Affiliate of Deerfield Farmers' Telephone Company.