



Santa Rosa Telephone Cooperative, Inc. Robocall Mitigation Plan

This Robocall Mitigation Plan describes the specific reasonable steps that Santa Rosa Telephone Cooperative, Inc. ("Santa Rosa") has taken to avoid the origination, carrying, or processing of illegal robocall traffic on its network.

Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Calls

Santa Rosa has a "*know-your-customer*" policy through which it exercises due diligence in ensuring that our services are not being used to originate illegal traffic.

Santa Rosa exercises caution in granting access to high-volume origination services to ensure that bad actors do not abuse these services. Specifically, Santa Rosa extensively investigates potential business customers seeking access to high-volume origination services prior to providing service by collecting information such as their physical business location, contact person(s), state or country of incorporation, federal tax ID, and the general nature of their business.

In addition, Santa Rosa requires new and renewing business customers to sign contracts containing provisions that allow for termination in the event high-volume origination services are abused. Santa Rosa will not hesitate to enforce these provisions if necessary.

"Know-Your-Upstream Provider" Procedures

Santa Rosa exercises due diligence prior to accepting traffic from an upstream provider as it seeks to ensure that such providers are not using Santa Rosa to carry or process a high volume of illegal traffic. Specifically, Santa Rosa collects information such as the upstream provider's physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of their business.

Use of Call Analytics Systems

Santa Rosa uses Carrier Management Systems' NAMS Firefly solution to monitor voice traffic on its network for calling patterns consistent with illegal robocall campaigns and fraudulent calls. NAMS Firefly provides Santa Rosa with complete visibility in its voice network. NAMS Firefly comes with multiple interfaces, accepts multiple record formats, and offers total network visibility and data mining capabilities.

Commitment to Respond to Traceback Requests

- **Santa Rosa** commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping illegal robocallers that use its service to originate, carry, or process illegal robocalls.