

**ROBOCALL MITIGATION PLAN FOR
Ontario Telephone Company, Inc.**

Ontario Telephone Company, Inc. is eligible for the continuing STIR/SHAKEN implementation deadline under FCC rules §64.6304(a)(2) and §64.6304(d).

The Operating Company Number (OCN) for Ontario Telephone Company, Inc. is 0112.

Ontario Telephone Company Inc.'s Principals, Affiliates, Subsidiaries and Parent Companies are:

Future Fiber Parent LP
Future Fiber Holdings LLC
Future Fiber FinCo LLC
Otelco Parent, Inc.
Otelco, Inc.
Netspeed Holdings, Inc.
Netspeed Parent, Inc.
Lantek Fiber Optic Services, Inc.
Lantek Communications NY, Inc.
Icon Connections, Inc.
Otelco Telecommunications LLC
Pine Tree Telephone LLC
Saco River Telephone LLC
Mid-Maine Telecom LLC
CRC Communications LLC
Mid-Maine TelPlus LLC
Granby Telephone LLC
Netspeed LLC
Shoreham Telephone LLC
War Telephone LLC
Otelco Mid-Missouri LLC
Hopper Telecommunications LLC
Otelco Telephone LLC
Brindle Mountain Telephone LLC
Blountsville Telephone LLC
Trumansburg Telephone Company, Inc.
Finger Lakes Communication Group Inc.
Netspeed Management, Inc.

Ontario Telephone Company, Inc. qualifies for the continuing extension of the STIR/SHAKEN implementation deadline as a small voice service provider (§64.6304 (a)(2) that has non-IP portions within its network §64.6304(d).

Ontario Telephone Company, Inc. provides local service to fewer than 100,000 voice subscriber lines.

As required to meet the non-IP network criteria for the continuing extension and consistent with §64.6303 (a)(2), Ontario Telephone Company, Inc. is a member of NTCA and NTCA participates on the ATIS Non-IP taskforce working group which is working to develop non-IP caller ID authentication solutions. NTCA is serving as a third-party representative on the ATIS Non-IP taskforce working group for Ontario Telephone Company, Inc.

Ontario Telephone Company, Inc. also originates calls via SIP connections within its network. Ontario Telephone Company, Inc. has registered with the Policy Administrator and is an authorized service provider in the STIR/SHAKEN ecosystem. Ontario Telephone Company, Inc. has implemented STIR/SHAKEN within its network and signs the calls originating on the IP portion of its network.

ROBOCALL MITIGATION PLAN

All voice traffic that originates on the Ontario Telephone Company, Inc. network is subject to the following Robocall Mitigation Plan.

Ontario Telephone Company, Inc. has contracted with TNS Call Guardian to provide robocall analytics. TNS uses software to monitor outbound voice traffic and provides a negative reputation score if potential robocalling activity is detected.

Call Analytics & Investigation

Ontario Telephone Company, Inc. investigates calls identified by TNS as potential robocalls. If the traffic appears suspicious, an employee will contact the customer. If the traffic is not legitimate, the employee will block the customer's access.

Enforcement

Illegal robocalls and fraudulent spoofing are prohibited on the Ontario Telephone Company, Inc. network. If it is determined that a customer of Ontario Telephone Company, Inc. is using the network to fraudulently spoof calls or to originate illegal robocalls, Ontario Telephone Company, Inc. will either warn the customer to stop such practices and/or terminate their service as allowed per the terms of service or tariffs.

Know Your Customer

Ontario Telephone Company, Inc. has procedures in place to prevent new and renewing customers from using the networks to originate illegal robocalls. Ontario Telephone Company, Inc. 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. Residential customers are asked to provide their full name, address (physical and mailing, if different), last four digits of their social security number, date of birth, phone number, and email, as well as establish a security question and a password. Business customers are asked to provide their full name, address (physical and mailing, if different), tax identification number, phone number, and email, as well as establish a security question and a password. To initiate an account change, a customer must provide their password or the answer to their security question prior to initiating a change. If the customer is unable to provide that information, the customer service representative will call the customer back using the number they provided at account setup.

In addition, all end users agree to terms and conditions of service that prohibit use of the Ontario Telephone Company, Inc. network for fraudulent or illegal purposes. If end users are found in violation of the terms of service, the end user's service may be suspended or terminated after an investigation.

Know Your Upstream Providers

Ontario Telephone Company, Inc. knows all the carriers from which it receives traffic and has confirmed that all of the carriers are listed in the Robocall Mitigation Database. Ontario Telephone Company, Inc. has also reviewed the connected carriers' robocall mitigation plans to learn how the carriers monitor their originating traffic to mitigate illegal robocalls. Ontario Telephone Company, Inc. does not directly receive traffic from any foreign originating or intermediate provider. No provider is using Ontario Telephone Company, Inc.'s network to carry or process a high volume of illegal traffic onto the U.S. network. In addition, Ontario Telephone Company, Inc. is now incorporating traceback and prohibited traffic language in all new contractual agreements with upstream carriers.

Role In the Call Chain

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

Traceback

Ontario Telephone Company, Inc. 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

Ontario Telephone Company, Inc. has not been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling.

Ontario Telephone Company, Inc. has not been prohibited from filing in the Robocall Mitigation Database (RMD).

Ontario Telephone Company, Inc.
Robocall Mitigation Plan – Addendum 1 – October 2024

Parent and Affiliate Companies	Relationship to Filing Entity	OCN	FRN
Future Fiber Parent LP	Parent		0029860749
Future Fiber Holdings LLC	Parent		0029860715
Future Fiber FinCo LLC	Parent		0029860236
Otelco Parent, Inc.	Parent		
Otelco, Inc.	Parent		0022618441
Netspeed Holdings, Inc.	Affiliate		
Netspeed Parent, Inc.	Affiliate		
Lantek Fiber Optic Services, Inc.	Affiliate		
Lantek Communications NY, Inc.	Affiliate		
Icon Connections, Inc.	Affiliate		
Otelco Telecommunications LLC	Affiliate		0003741980
Pine Tree Telephone LLC	Affiliate	0020	0004997516
Saco River Telephone LLC	Affiliate	0022	0005555925
Mid-Maine Telecom LLC	Affiliate	3315	0017225723
CRC Communications LLC	Affiliate	236F (MA), 1255 (ME), 651D (NH)	0003713906
Mid-Maine TelPlus LLC	Affiliate		0021454806
Granby Telephone LLC	Affiliate	0036	0003731791
Netspeed LLC	Affiliate		0026646661
Shoreham Telephone LLC	Affiliate	0064	0020820189
War Telephone LLC	Affiliate	0258	0005057328
Otelco Mid-Missouri LLC	Affiliate	1917	0018538496
Hopper Telecommunications LLC	Affiliate	0300	0008702433
Otelco Telephone LLC	Affiliate	0312	0018538512
Brindlee Mountain Telephone LLC	Affiliate	0283	0001775295
Blountsville Telephone LLC	Affiliate	0282	0006925440
Trumansburg Telephone Company, Inc.	Affiliate	0131	0003412871
Finger Lakes Communications Group, Inc.	Affiliate		0011581931
Netspeed Management, Inc.	Affiliate		0033445198

Company Officers with Management Responsibilities within Ontario Telephone Company, Inc.:

Richard Clark - President
Trina Bragdon - Secretary
Anna Reynolds – Treasurer

Ontario Telephone Company, Inc.
Robocall Mitigation Plan – Addendum 1 – October 2024

Board of Trustees:

Scott Baker
Jeffrey Butler
Jennifer Jun
Benjamin Diesbach
Frank Chiaino
Richard Clark
John Cinelli
Rachelle Chong
Paul Griswold