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HOT SPRINGS TELEPHONE CO.

Robocall Mitigation Plan

This Robocall Mitigation Plan describes the specific reasonable steps that Hot Springs Telephone Company (“Hot Springs”) has taken to avoid the origination, carrying or processing of illegal robocall traffic. Hot Springs uses a third-party provider, [Access Montana](#), for all of its switching and trunks. Therefore, Hot Springs lacks control over the network infrastructure necessary to implement STIR/SHAKEN.

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

Hot Springs has a “know-your-customer” policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. Hot Springs verifies that prospective business customers and the general nature of their businesses are legitimate.

Although Hot Springs’ customers generally do not generate a high volume of calls, were the Company to receive a request for high-volume origination services, it would extensively investigate such customers before granting access to the services.

Hot Springs has a written policy which allows for the termination of a customer’s phone service if the service is being abused (such as for the origination of illegal robocalls).

If a new or renewing customer orders more than five service lines, Hot Springs will contact them to determine the intended use of the service. If it is determined that the services will be used for illegal robocalls, Hot Springs will refuse to initiate the service. If it is determined that the lines are needed for legitimate calling, Hot Springs will install the service lines and place the customer on a watch list in case their business model changes.

“Know-Your-Upstream Provider” Procedures

Hot Springs relies upon the “know-your-upstream provider” procedures of its third-party switching provider, Access Montana. Hot Springs is confident that Access Montana exercises due diligence before accepting traffic from an upstream provider.

Use of Call Analytics Systems

Hot Springs relies on the network monitoring capabilities of its third-party switching provider, Access Montana, to alert us of any irregular calling patterns that suggest a Hot Springs customer may be engaged in illegal robocalling.

Commitment to Respond to Traceback Requests

Hot Springs 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.