

**Arapahoe Telephone Company
dba/Applied Communications Technology, Inc**

ROBOCALL MITIGATION PLAN

VERIFICATION OF NEW CUSTOMERS INSTALLATION POLICY

Each potential new customer (business or residential) must complete our service application. We assist with the various needed information on that form and require the customer to sign the application. During the conversation to complete the application for business customers, we verify if they will be a high-volume user. If they verify that they are not going to be a high-volume user, we complete the application. If the customer verifies that they could potentially be a high-volume user, we make sure they understand that their service may be terminated if it is deemed that the service is being used or abused for any illegal activity. There is a statement on the application to that effect.

Physical verification is mandatory for all new residential and business installations at the time the potential customer applies for service. We require to see a valid driver's license and make a photocopy of all authorized party's licenses on each account for verification. Federal identification numbers and State of Incorporation are required for new business installations.

CALL BLOCKING

Arapahoe Telephone Company dba/Applied Communications Technology, Inc offers a free service called Selective Call Blocking. All customers may sign up for this service at any point in time.

PROCESS FOR ROBOCALL MITIGATION

The Arapahoe Telephone Company dba/Applied Communications Technology, Inc, 606 ELM ST ARAPAHOE, NE 68922 switch pushes files to an ftp site that RVW, Inc. 4118 HOWARD BLVD COLUMBUS, NE 68602 can access twice a day at roughly 12:10 a.m. CT and 12:10 p.m. CT.

RVW, Inc. downloads the files around 8:00 a.m. CT each business day. Weekend and holiday files are processed on the next business day.

Each business day, RVW, Inc. converts the switch files into a standardized RVW LAMA format.

During the conversion, call patterns are monitored and suspicious call patterns are identified. These will be originating calls from a single telephone number which exceed established thresholds based on prior usage. RVW, Inc. can then run additional analysis of the data and produce detailed reports, which include the originating and terminating numbers along with call times, call duration, and high volume. These detailed reports are then forwarded to the General Manager, Administrative Office Manager, and Senior Network Specialist for further investigation. Contact details in Appendix A.

RVW, Inc. realizes that at times, schools, civil defense, and other organizations may make mass calls that we are not aware of. This calling would also be forwarded to the General Manager, Office Manager, and CO Manager for further investigation.

KNOW YOUR UPSTREAM PROVIDER PROCEDURES

As a rural provider of voice services, the number of upstream providers used by the Provider to receive and deliver its originated voice calls for termination are somewhat limited. The Provider has longstanding relationships with these upstream providers and 4 maintains its awareness of the nature of their businesses and the legitimacy of their call transmission services. Further, the Provider, in the interest of providing the highest quality services to all of its voice service customers, is committed to taking those steps necessary to ensure that any upstream providers providing connectivity are equally committed to monitoring their networks and preventing their use for the transmission of illegal robocalls. This includes the use of robocall prevention language in any contracts that the Provider may directly have with any upstream provider entities. Included as part of Appendix A to this Robocall Mitigation Plan document is a list of the Provider's current, immediate "Upstream Provider(s)" along with contact information for each.

THIRD-PARTY CALL ANALYTICS

The Provider also uses third-party call analytics to further assist and prevent the origination of illegal robocalls on its network. Robocall Mitigation Program Company uses software provided by TransNexus to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts us if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. We immediately investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If we determine that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as appropriate. Included in Appendix A is the name of the vendor(s) used along with a description of the call analytics system(s) used to identify and block illegal robocall traffic.

STIR/SHAKEN PLANNING

Arapahoe Telephone Company dba/Applied Communications Technology, Inc as of now is a TDM only provider and are exempt from STIR/Shaken. We are also in discussions with our long-distance providers for input on services they can offer to help mitigate the problems with STIR/SHAKEN.

EXTENSIONS

Arapahoe Telephone Company dba/Applied Communications Technology, Inc has received the following types of extensions of the STIR/SHAKEN implementation requirements under §64.304 of the FCC's rules: (1) the small voice service providers extension (§64.304(a)), and (2) the non-IP networks extension (§64.6304(d)).

Arapahoe Telephone Company dba/Applied Communications Technology, Inc, 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.

Appendix A

Traceback Request Single Point of Contact:

Name: John E Koller

Title: General Manager

Phone Number: 308-962-7298

Email Address: jkoller@atcjet.com

Name: Laurie Magnus-Warner

Title: Administrative Office Manager

Phone Number: 308-962-7298

Email Address: laurie@atcjet.com

Name: Corey Groves

Title Senior Network Specialist

Phone Number: 308-962-7298

Email Address: cgroves@atcjet.com

Upstream Provider Information:

Name of Upstream Provider: Lumen

Nature of Business: Tandem Switch Provider

Network Location of Upstream Provider: Grand Island, NE

Name of contact: Wendy Gray

Title: Account Manager

Phone Number: 541-716-6308

Email Address: wendy.gray@lumen.com

Upstream Provider Information:

Name of Upstream Provider: Toly Digital Networks

Nature of Business: Tandem Switch Provider

Network Location of Upstream Provider: Jupiter, FL

Name of contact: Mark Suto

Title: Account Manager

Phone Number: 561-694-8655

Email Address: mark.suto@tolydigital.net