



Robocall Mitigation Plan

This robocall mitigation plan is for Lincoln Telephone Company, with headquarters at 111 Stemple Pass Rd. Lincoln, Montana.

Principals (Board Members)

The following individuals exercise management or control of Lincoln Telephone Company:

- **Tim Mulcare** (President)
- **John Baucus** (Vice President)
- **Ken Lumpkin** (Secretary)
- **Emily Gullick** (Director)
- **Scott Stoner** (Director)

Affiliates

Lincoln Telephone Company has the following affiliate:

- **Vision Net Inc.**, in which Lincoln Telephone Company holds an 8% ownership stake.

Roles in the Call Chain

- Lincoln Telephone Company is a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.

Compliance and History

- Lincoln Telephone Company has not been prohibited from filing a certification in the Robocall Mitigation Database.
- Lincoln Telephone Company does not have a history of enforcement actions for illegal robocalls, TCPA or TSR violations, or related state law violations.

Measures to Prevent Illegal Robocalls

Know Your Customer

We follow the caller ID authentication best practices for vetting caller identity and operational legitimacy for new and existing customers as described by the NANC Call Authentication Trust Anchor Working Group. This process includes:

- Collecting and reviewing entity-identifying information to confirm an authenticated relationship with the customer.
- Validating, when possible, that the entity has a legitimate right to use its asserted calling numbers.
- Supporting the attestation level assigned to calls originated by the customer.

Our contractual provisions prohibit customers from initiating illegal robocalls. If suspicious robocalls are identified, we:

1. Warn the customer to stop.
2. Terminate their service if such traffic continues.

Know Your Upstream Provider

We have a vetting and review process for upstream providers that send us voice traffic for termination or transit. This includes:

- Confirming the upstream provider's registration in the Robocall Mitigation Database.
- Ensuring the provider has a reasonable robocall mitigation plan and uses call analytics to identify suspicious traffic.
- Understanding the provider's role in the call path to determine our obligations for authenticating unsigned traffic.

Our contractual provisions prohibit upstream providers from sending us illegal robocalls. If suspicious traffic is identified, we:

1. Warn the upstream provider to stop.
2. Terminate their service if such traffic continues.

Traceback

We respond within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium. We fully cooperate with these entities to investigate and stop illegal robocallers using our services.

Robocall Mitigation Program

We use call analytics software provided by TransNexus to monitor all outbound voice traffic in real time to prevent the origination or transit of illegal robocalls. This includes:

- Detailed reporting to identify suspected illegal robocalls.

- Alerts for calls with poor reputation or invalid, unallocated, or Do Not Originate numbers.

For identified suspicious calls, we:

1. Investigate the caller or upstream provider.
2. Warn them to stop if traffic is likely unlawful.
3. Terminate their service if unlawful traffic continues.

STIR/SHAKEN

- We have registered with the STI-PA using OCN 2244.
- We hold a STIR/SHAKEN certificate issued by the TransNexus Certification Authority (STI-CA).
- We have implemented a STIR/SHAKEN solution supplied by TransNexus.

This plan reflects our commitment to compliance and proactive measures to mitigate illegal robocalls.