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Robocall Mitigation Plan

Know Your Customer

New Paris Telephone is a Rural Local Exchange Carrier while Auburn Essential Services is a Competitive Local Exchange Carrier sharing a common Metaswitch serving 8,200 residential and small business subscribers in Northern Indiana via copper outside plant and Fiber IP based Systems that we own. In addition, we provide competitive local exchange service to medium businesses in adjacent communities via IP connections that we also own.

We follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group.

(<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

Our largest customer has 96 voice channels (so they can place at most 96 simultaneous calls). All our customers are subject to an Acceptable Use Policy and will incur significant charges if they place an excessive number of calls and/or use an unusually large number of minutes.

Caller-ID for our customers is assigned by our switch. For our CLEC customers, we either assign the Caller-ID or screen what they provide against a list of numbers we have assigned to their service.

Traceback

We will respond to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls.

The Companies have never received a traceback request. If we do, we will respond immediately and investigate the source.

STIR/SHAKEN

We have fully implemented STIR/SHAKEN to the extent practicable.

Some of the voice traffic we originate on our voice network is authenticated with STIR/SHAKEN. The remainder of the voice traffic that originates on our network is subject to the robocall mitigation program described in this document.

Robocall Mitigation Program

We use software provided by our switch provider and a third party platform 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 the call source 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.