

Citizens Mutual Telephone Cooperative Robocall Mitigation Plan

About

Citizens Mutual Telephone Cooperative (CMTC) is an independent telephone company headquartered in Bloomfield, Iowa. CMTC's service territory is limited in scope and is predominately in one county in Iowa, Davis County. The service area is approximately 433 square miles. We provide telephone service to 1443 residential and business customers.

With the limited geography and customer base, CMTC has a very close relationship to our customers and their business practices. As such, it is highly unlikely that any of them can and will engage in originating robocalls.

CMTC owns and operates a Ribbon class 5 switch. Our network is predominately TDM based with limited hosted IP PBX services hosted on Clay County Rural Telephone Cooperative, Inc., dba GigTel's switching platform. Due to the customer's served, we have limited toll trunks to provide connectivity outside our local calling area. With the limited capacity, it is neither feasible nor attractive to a robocall entity to originate enough calls from within our network to be entices to use our network.

However, in the unlikely event we do have a customer that originates robocalls, CMTC will fully cooperate as outlined below to mitigate the robocalling activities.

Aureon Caller ID Authentication (CIDA)

CMTC has implemented Aureon's CIDA service as certified with the attachment. The CIDA service not only authenticated inbound calls to limit the number of robocalls CMTC's customers received, but it also is used to authenticate the outbound calls from our customers. Thereby creating an automated method of rejecting calls that fit the criteria for suspicious and invalid traffic. Aureon uses the STI-PA (Secure Telephone Identity Policy Administrator) approved vendor TransNexus for Robocall Mitigation.

Traceback Cooperation

- CMTC will cooperate in traceback investigations. To allow for timely and comprehensive law enforcement efforts against illegal robocallers, CMTC will dedicate sufficient resources to provide prompt and complete responses to traceback requests from law enforcement and from USTelecom's Industry Traceback Group. CMTC has identified a single point of contact in charge of responding to these traceback requests and will respond to traceback requests as soon as possible or within 24 hours, excluding weekends and all major holidays.
- CMTC will require traceback cooperation. For all business governing the transport of voice calls, our policy will specify the use of best efforts to require cooperation in traceback investigations by identifying the upstream provider from which the suspected illegal robocall entered its network or by identifying our own customer if the call originated in our network.

Subscriber Vetting Practices / New and Renewing Customers

- Residential and small business practices
 - CMTC will vet residential and small businesses through normal business practices and obtains billing address, primary residence, or business location.
- Commercial retail end-users
 - CMTC confirms the identity of commercial customers by collecting information such as physical business location, contact person(s), federal tax ID, and the nature of the customer's business.
 - CMTC has call detail records from our Ribbon switching platform and with assistance from our tandem toll provider Aureon, will determine typical call volume and potential reasons for significant deviations from the typical call volume. CMTC will determine if there are legitimate reasons for any customer to be making a number of high volume, short duration calls. CMTC will contact any commercial business within 24 hours of complaint or deviations to determine if call volumes are legitimate.
- Wholesale Customers
 - CMTC will be responsible for the resale providers who lease voice services CMTC. CMTC has call records and will closely monitor for significant deviations from the typical call volume of the reseller CMTC will contact resale provider within 24 hours of such known deviations to determine if call volumes are legitimate.

Telephone Number Validation Practices

- CMTC participates in all voice network national databases that provision legitimate telephone numbers to be used in North America. These industry databases include: CMTC's registered National Exchange Carrier Association (NECA) ILEC Operating Company Number (OCN 1129), North American Numbering Plan Administration (NANPA) for our NPA-NXX, Telcordia TRA dba Iconectiv Local Exchange Routing Guide (LERG), as well as National Portability Administration Center (NPAC).
- Telephone Number Validation is necessary and appropriate when an End-User's right-to-use the telephone number is unknown to CMTC. CMTC will validate as necessary and appropriate.

International Practices

- CMTC will continue to monitor best practices and implement as needed.
- CMTC does not sell numbers to any international service providers.

Know your Upstream Provider

CMTC only uses two upstream providers and knows the voice carriers from which it interconnects with to the PSTN (Public Switched Telephone Network). Both have close business relationships with CMTC. Iowa Network Services, dba Aureon, is a statewide Iowa based provider owned by local Iowa based voice service providers, including CMTC. As an owner of Aureon, CMTC has a common interest to ensure originating illegal robocalling activities are not initiated from our collective network. Clay County Rural Telephone Cooperative, Inc., dba GigTel, is a telecommunications cooperative that has a shared interest and similar ownership structure with CMTC. Gigtel has a similar interest in providing high quality voice services with the absence of illegal robocalling activities. CMTC, Iowa Network Services, and Clay County Rural Telephone Cooperative have decades of experience and relationships in

providing voice services to rural areas. CMTC monitors FCC Blocking Orders as outlined in the Traced Act Fourth Report and Order and is fully capable of blocking voice traffic originating or terminating into our voice customers.

Ongoing Mitigation Practices

- CMTC will investigate suspicious calls and calling patterns. If CMTC detects a pattern consistent with illegal robocalls, or otherwise has reason to suspect illegal robocalling or spoofing is taking place over our network, CMTC will seek to identify the party that is using our network to originate, route, or terminate these calls and take appropriate action. Taking appropriate action may include, but is not limited to, initiating a traceback investigation, verifying that the originating commercial customer owns or is authorized to use the Caller ID number, determining whether the Caller ID name sent to a receiving party matches the customer's corporate name, trademark, or d/b/a name, terminating the party's ability to originate, route, or terminate calls on its network, and notifying law enforcement authorities.
- CMTC will use best practices or methods available to monitor their call records as part of its robocall mitigation techniques.
- All of the calls that CMTC carries or processes on its network are subject to a robocall mitigation plan consistent with 47 C.F.R. § 64.6305(c), any prior certification has not been removed by Commission action and Aureon Communications, L.L.C. has not been prohibited from filing in the Robocall Mitigation Database by the FCC.
- In the prior two years, CMTC has not been the subject of a formal FCC, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation plan description.

CMTC also contracts with third party vendor, GigTel, who in turn contracts with TransNexus. Using the TransNexus Clear IP software platform, the company is able to provide STIR/SHAKEN authentication and verification on the SIP portions of our network.

CMTC's primary contact for any robocall questions or enforcement.

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