

**ROBOCALL MITIGATION PLAN FOR  
Saco River Telephone LLC, d/b/a GoNetspeed**

Saco River Telephone LLC d/b/a GoNetspeed is eligible for the continuing STIR/SHAKEN implementation deadline under FCC rules §64.6304(a)(2) and §64.6304(d).

The Operating Company Number (OCN) for Saco River Telephone LLC is 0022.

Saco River Telephone LLC's Principals, Affiliates, Subsidiaries and Parent Companies are:

Future Fiber Parent LP  
Future Fiber Holdings LLC  
Future Fiber FinCo LLC  
Otelco Parent, Inc.  
Otelco, Inc.  
Netspeed Holdings, Inc.  
Netspeed Parent, Inc.  
Lantek Fiber Optic Services, Inc.  
Lantek Communications NY, Inc.  
Icon Connections, Inc.  
Otelco Telecommunications LLC  
Pine Tree Telephone LLC  
Mid-Maine Telecom LLC  
CRC Communications LLC  
Mid-Maine TelPlus LLC  
Granby Telephone LLC  
Netspeed LLC  
Shoreham Telephone LLC  
War Telephone LLC  
Otelco Mid-Missouri LLC  
Hopper Telecommunications LLC  
Otelco Telephone LLC  
Blountsville Telephone LLC  
Brindlee Mountain Telephone LLC  
Trumansburg Telephone Company, Inc.  
Ontario Telephone Company, Inc.  
Finger Lakes Communication Group Inc.  
Netspeed Management, Inc.

Saco River Telephone LLC qualifies for the continuing extension of the STIR/SHAKEN implementation deadline as small voice service providers (§64.6304 (a)(2)) that have non-IP portions within their networks §64.6304(d).

Saco River Telephone LLC provides local service to fewer than 100,000 voice subscriber lines.

As required to meet the non-IP network criteria for the continuing extension and consistent with §64.6303 (a)(2), Saco River Telephone LLC is a member of NTCA and NTCA participates on the ATIS Non-IP taskforce working group which is working to develop non-IP caller ID authentication solutions. NTCA is serving as Saco River Telephone LLC's third-party representative on the ATIS Non-IP taskforce working group.

Saco River Telephone LLC also originates calls via SIP connections within its networks. Saco River Telephone LLC has registered with the Policy Administrator and is an authorized service provider in the STIR/SHAKEN ecosystem. Saco River Telephone LLC has implemented STIR/SHAKEN within its network and signs the calls originating on the IP portions of Saco River Telephone LLC's network.

## **ROBOCALL MITIGATION PLAN**

All voice traffic that originates on Saco River Telephone LLC's network is subject to the following Robocall Mitigation Plan.

Saco River Telephone LLC has contracted with Equinix to provide robocall analytics and reputation scoring of the network's outbound traffic. Equinix uses software to monitor outbound voice traffic using call detail records in 15-minute to 6-hour intervals (depending on the switch) and will send detailed reporting identifying if the network originates any calls where the calling number is invalid, unallocated, or is otherwise suspicious. If suspicious activity is detected, Equinix will send an alert to Saco River Telephone LLC's Network Operations Center (NOC).

### **Call Analytics & Investigation**

Saco River Telephone LLC investigates calls identified by Equinix as suspicious calls or those that have abnormal call volumes, patterns or activity consistent with illegal robocalls. When Equinix sends an alert to the NOC an employee will evaluate the report to determine if traffic is legitimate or not. If the traffic appears suspicious, the employee will contact the customer. If the traffic is not legitimate, the employee will block the customer's access.

### **Enforcement**

Illegal robocalls and fraudulent spoofing are prohibited on Saco River Telephone LLC's network. If it is determined that a customer of Saco River Telephone LLC is using the network to fraudulently spoof calls or to originate illegal robocalls, Saco River Telephone LLC will either warn the customer to stop such practices and/or terminate their service as allowed per Saco River Telephone LLC's terms of service or tariffs.

### **Know Your Customer**

Saco River Telephone LLC has procedures in place to prevent new and renewing customers from using the network to originate illegal robocalls. Saco River Telephone LLC thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services. Residential customers are asked to provide their full name, address (physical and mailing, if different), last four digits of their social security number, date of birth, phone number, and email as well as establish a security question and a password. Business customers are asked to provide

their full name, address (physical and mailing, if different), tax identification number, phone number, and email, as well as establish a security question and a password. To initiate an account change, a customer must provide their password or the answer to their security question prior to initiating a change. If the customer is unable to provide that information, the customer service representative will call the customer back using the number they provided at account setup.

In addition, all end users agree to terms and conditions of service that prohibit use of Saco River Telephone LLC's network for fraudulent or illegal purposes. If end users are found in violation of the terms of service, the end user's service may be suspended or terminated after an investigation.

### **Know Your Upstream Providers**

Saco River Telephone LLC knows all the carriers from which it receives traffic and has confirmed that all of the carriers are listed in the Robocall Mitigation Database. Saco River Telephone LLC has also reviewed the connected carriers' robocall mitigation plans to learn how the carriers monitor their originating traffic to mitigate illegal robocalls. Saco River Telephone LLC does not directly receive traffic from any foreign originating or intermediate provider. No provider is using Saco River Telephone LLC's network to carry or process a high volume of illegal traffic onto the U.S. network. In addition, Saco River Telephone LLC is now incorporating traceback and prohibited traffic language in all new contractual agreements with upstream carriers.

### **Role In the Call Chain**

Saco River Telephone LLC is a voice service provider with a STIR/SHAKEN implementation obligation on the IP-Portions of their networks. Saco River Telephone LLC is also a voice service provider without a STIR/SHAKEN obligation on the Non-IP portions of their networks because those portions of the Saco River Telephone LLC's network rely on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

### **Traceback**

Saco River Telephone LLC will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium fully and within twenty-four (24) hours.

### **Robocall Mitigation Database Eligibility**

Saco River Telephone LLC has not been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling.

Saco River Telephone LLC has not been prohibited from filing in the Robocall Mitigation Database (RMD).

**Saco River Telephone LLC**  
**Robocall Mitigation Plan – Addendum 1 – October 2024**

| <b>Parent and Affiliate Companies</b>   | <b>Relationship to Filing Entity</b> | <b>OCN</b>                      | <b>FRN</b> |
|-----------------------------------------|--------------------------------------|---------------------------------|------------|
| Future Fiber Parent LP                  | Parent                               |                                 | 0029860749 |
| Future Fiber Holdings LLC               | Parent                               |                                 | 0029860715 |
| Future Fiber FinCo LLC                  | Parent                               |                                 | 0029860236 |
| Otelco Parent, Inc.                     | Parent                               |                                 |            |
| Otelco, Inc.                            | Parent                               |                                 | 0022618441 |
| Netspeed Holdings, Inc.                 | Affiliate                            |                                 |            |
| Netspeed Parent, Inc.                   | Affiliate                            |                                 |            |
| Lantek Fiber Optic Services, Inc.       | Affiliate                            |                                 |            |
| Lantek Communications NY, Inc.          | Affiliate                            |                                 |            |
| Icon Connections, Inc.                  | Affiliate                            |                                 |            |
| Otelco Telecommunications LLC           | Affiliate                            |                                 | 0003741980 |
| Pine Tree Telephone LLC                 | Affiliate                            | 0020                            | 0004997516 |
| Mid-Maine Telecom LLC                   | Affiliate                            | 3315                            | 0017225723 |
| CRC Communications LLC                  | Affiliate                            | 236F (MA), 1255 (ME), 651D (NH) | 0003713906 |
| Mid-Maine TelPlus LLC                   | Affiliate                            |                                 | 0021454806 |
| Granby Telephone LLC                    | Affiliate                            | 0036                            | 0003731791 |
| Netspeed LLC                            | Affiliate                            |                                 | 0026646661 |
| Shoreham Telephone LLC                  | Affiliate                            | 0064                            | 0020820189 |
| War Telephone LLC                       | Affiliate                            | 0258                            | 0005057328 |
| Otelco Mid-Missouri LLC                 | Affiliate                            | 1917                            | 0018538496 |
| Hopper Telecommunications LLC           | Affiliate                            | 0300                            | 0008702433 |
| Otelco Telephone LLC                    | Affiliate                            | 0312                            | 0018538512 |
| Blountsville Telephone LLC              | Affiliate                            | 0282                            | 0006925440 |
| Brindlee Mountain Telephone LLC         | Affiliate                            | 0283                            | 0001775295 |
| Trumansburg Telephone Company, Inc.     | Affiliate                            | 0131                            | 0003412871 |
| Ontario Telephone Company, Inc.         | Affiliate                            | 0112                            | 0004315362 |
| Finger Lakes Communications Group, Inc. | Affiliate                            |                                 | 0011581931 |
| Netspeed Management, Inc.               | Affiliate                            |                                 | 0033445198 |

Company Officers with Management Responsibilities within Saco River Telephone LLC:

Richard Clark - President  
Trina Bragdon - Secretary  
Anna Reynolds – Treasurer

Rev. October 2024 (see Addendum 1)

**Saco River Telephone LLC**  
**Robocall Mitigation Plan – Addendum 1 – October 2024**

Board of Trustees:

Scott Baker  
Jeffrey Butler  
Jennifer Jun  
Benjamin Diesbach  
Frank Chiaino  
Richard Clark  
John Cinelli  
Rachelle Chong  
Paul Griswold