

Project Telephone Company ROBOCALL MITIGATION PLAN

Project Telephone Company (Project), Operating Company Number (2250), is eligible for the continuing extension of the STIR SHAKEN implementation deadline as a small voice service provider (§64.6304 (a)(2) that has non-IP portions within its network §64.6304(d).

Project provides local service to fewer than 100,000 voice subscriber lines. The majority of the customers are served on the non-IP portions of Project's network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

To meet the non-IP network criteria for the continuing STIR SHAKEN extension (§ 64.6303 (a)(2)), Project is a member of NTCA and WTA – Advocates for Rural Broadband. NTCA and WTA – Advocates for Rural Broadband participates on the ATIS Non-IP taskforce working group which developed the (ATIS Solutions) non-IP call authentication solutions. NTCA and WTA – Advocates for Rural Broadband are serving as Project's third party representative on the ATIS Non-IP taskforce working group.

Project also originates calls via SIP connections within its network. Project has registered with the Policy Administrator and is an authorized service provider in the STIR|SHAKEN ecosystem. Project has implemented STIR|SHAKEN within its IP-network and signs the calls originating on the IP portions of Project's network.

Robocall Mitigation Plan

All voice traffic that originates on Project's network is subject to the following Robocall Mitigation Plan.

Call Analytics & Enforcement

Project uses TNS Call Guardian analytics technologies and services to monitor traffic on its network and identify potentially unlawful call origination activity.

Project blocks the following types of calls by default:

- Calls originating from invalid numbers
- Calls originating from DNO numbers

If Project has a reasonable basis to believe that a customer is originating illegal robocalls, it will require the customer to remedy the problem and, if effective action is not taken, Project can suspend and/or terminate service to the customer.

Know your Customer - Customer Due Diligence

Project conducts due diligence on new and renewing customers, confirming the customer's identity and, if it is a business, its incorporation documents. The Company confirms the customer's service address for all customers.

- Project verifies customer's credit history and business reputation prior to providing service.
- Project verifies customer information when contracts are renewed, or services are added.
- Project verifies the customer's identity and their right to use the telephone number presented on calls.
- Project has policies that define the circumstances by which it will deny, suspend or terminate service to a customer.

Upstream Provider Knowledge

Project knows all the carriers from which it receives traffic and has confirmed that all of the carriers are listed in the Robocall Mitigation Database. Project has also reviewed the connected carrier's RMPs to learn how the carriers monitor their originating traffic to mitigate illegal robocalls. In addition, Project is now incorporating traceback and prohibited traffic language in all contractual agreements with upstream carriers.

Role In the Call Chain

Project is a voice service provider with a STIR/SHAKEN implementation obligation on the IP-Portions of its network. Project is also a voice service provider without a STIR/SHAKEN obligation on the Non-IP portions of its network because that portion of the network relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

Traceback

Project 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.

Robocall Mitigation Database Eligibility

Project has not been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling.

Project has not been prohibited from filing in the Robocall Mitigation Database (RMD).

Customer Education

Project posts information on its website to educate customers on how to protect themselves from becoming a victim of unlawful robocalls and a process to report complaints related to robocall activity.

Management and Ownership

Company Name	FRN	Relationship to Filing Entity	DBA	% Owned by Filing Entity	Management or Control of the Entity
Nemont Telephone Cooperative Inc	0001646470	Parent	Nemont	100%	Board of Directors/CEO Josh Jensen
Project Telephone Company, Inc	0003758315	Subsidiary	Nemont	Nemont Telephone Cooperative, Inc owns 100%	CEO Josh Jensen
Nemont Communications, Inc	0001637412	Subsidiary	Nemont	Nemont Telephone Cooperative, Inc owns 30.1% and Project Telephone Company, Inc owns 69.9%	CEO Josh Jensen
Sagebrush Cellular, Inc.	0001608645	Subsidiary	Nemont	Nemont Communications, Inc owns 100%	CEO Josh Jensen