

Robocall Mitigation Plan

February 17, 2026

Smithville Communications Inc., headquartered in Ellettsville, Indiana that offers voice and internet services, is fully committed to utilizing its resources to prevent illegal robocalls from originating on its network. As of February 2026, Smithville Communications had slightly less than 14,000 access lines. Our goal is to keep all Smithville customers from originating illegal robocalls and to protect our customers from receiving illegal robocalls as much as possible.

We are currently utilizing Call Guardian through TNS and Metaswitch. We have the infrastructure in place to implement STIR/SHAKEN through TNS and are currently implementing Call Guardian through TNS and Metaswitch. To that end, Smithville Communications submits this robocall mitigation plan, which is designed to comply with the Federal Communications Commission's Sixth Report and Order (FCC 24-73) regarding "Advanced Methods To Target and Eliminate Unlawful Robocalls." Smithville Communications already has implemented the robocall mitigation steps in this plan, and the company looks forward to working with the FCC, other industry groups and the Consortium to combat illegal robocalls.

The FCC eighth order lists updated affirmative obligations for voice service providers: (1) Respond to traceback requests from the Commission, civil and criminal law enforcement, and US Telecom's Industry Traceback Group ('Consortium'); (2) Take steps to effectively mitigate illegal traffic when it receives actual written notice of such traffic from the Commission; and (3) Implement affirmative, effective measures to prevent new and renewing customers from using its network to originate illegal calls. This plan will describe each obligation and Smithville Communications action steps/commitments in turn.

Commitment to respond to Traceback Requests from the Commission, Civil and Criminal Law Enforcement, and the Industry Traceback Consortium.

As the Commission states, traceback is an essential tool for determining the source of illegal robocalls. Smithville Communications will respond fully and 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 stopping illegal robocallers that use its service to originate, carry, or process illegal robocalls. To facilitate this response, Smithville Communications will maintain a designated point or points of contact to handle traceback requests. Those points of contact are:

David Kempf
Central Office Manager
1600 W Temperance St
Ellettsville IN 47429
(812)935-2292
david.kempf@smithville.com

Ryan Cloe
Central Office Engineer
1600 W Temperance St.
Ellettsville IN 47429
(812) 876-2211
ryan.cloe@smithville.com

These points of contact and contact information will be updated as necessary. In responding to traceback requests, Smithville Communications will employ the tools at its disposal. Smithville uses a Metaswitch softswitch for its voice traffic. The Metaswitch allows us to see where a call entered our switch by originating from one of our customers or by transit from a specific trunk. We also can determine if the call terminated to one of our subscribers or exited on a specific trunk. In summary, we can gather information as to whether a call originated or terminated to a specific Smithville customer, and whether a call entered or exited our switch on a specific trunk and Trunk Circuit Identification Code assigned to another carrier. With the information we can obtain, we will cooperate and respond fully and timely to any traceback request from the Commission, civil and criminal law enforcement, and the Consortium. If the request comes from the Commission and/or law enforcement, we will ensure that any such requests are consistent with other legal and regulatory requirements.

Take Steps to Effectively Mitigate Illegal Traffic when Notified by the Commission.

Smithville Communications is committed to mitigating illegal traffic on its network. As such, Smithville will take decisive action when notified by the Commission of suspected illegal calls. When Smithville receives notice from the Commission of suspected illegal calls, Smithville will promptly initiate an investigation into the traffic in question to determine, to the best of our ability, whether the traffic is in fact illegal robocalls, and to respond to the Enforcement Bureau with the results of that investigation. The investigation will involve researching and identifying the source of the traffic in question on Smithville's network and the origin of that traffic. If our investigation – utilizing call logs, Metaswitch call history and customer inquiries as necessary – determines that the traffic is not illegal, Smithville will provide to the Commission an explanation as to why we concluded the identified calls were not illegal and what steps we took to reach that conclusion. Reasons for such a conclusion may vary but might include, for example, verifying that the robocalls were for a legally permitted purpose or that the customer had written consent from the called parties to send such calls.

If a Smithville customer claims that its traffic is legal when that traffic has been flagged by the Commission, Smithville will require documented proof of prior express written consent from any

called parties. Smithville will refer any callers who believe they have been blocked in error to the Commission for review.

If our investigation determines that the traffic is suspect or, indeed, illegal, Smithville will take steps to mitigate that traffic according to the origin of the traffic on Smithville's network. For example, if we are notified about suspect traffic and we determine that the traffic in question entered our network not from a Smithville customer but from an upstream provider, we will inform the Commission of the source of the traffic and contact the upstream provider directly to inform them of the suspect traffic. Smithville will notify the upstream provider that Smithville, in accordance with applicable law, will to the best of its ability prevent illegal traffic from entering its network, including blocking calls from problem upstream providers identified as a source of illegal robocalls. In the event that a problem upstream provider continues to send illegal robocalls to Smithville's network, Smithville will block that problem provider's traffic until that provider ceases to send illegal robocalls. If Smithville determines that the illegal traffic originated from a Smithville customer, Smithville will immediately notify and inform that customer and take steps to prevent the customer from originating illegal robocalls. This can include a variety of mitigating actions, including implementing mandatory account codes for out dialing; barring calls to local numbers, national numbers, international numbers, or any combination of the three; blocking outgoing calls, incoming calls, or both; and/or severing Smithville's relationship with that customer if no other action solves the problem.

Implement Effective Measures to Prevent New and Renewing Customers from Originating Illegal Calls Know Your Customer

Smithville Communications believes that the best way to stop illegal robocalls is to prevent them from originating on our network. One of the biggest frustrations in the pervasiveness of illegal robocalls is caller ID spoofing. Illegal robocallers like to spoof their numbers to prevent their victims from knowing the actual source of the call. Smithville already has measures in place to prevent caller ID spoofing on our network. Through our Metaswitch softswitch, we only allow a customer to originate calls from a number that identifies in our switch as a number that has been assigned to that customer. This prevents a Smithville customer from originating calls with a spoofed caller ID number. When our Metaswitch softswitch determines that a Smithville customer is attempting to originate a call from a number not assigned to that customer, our switch will not allow the call to go through. We feel that this is a decisive and the best protective measure that a voice service provider can implement to prevent illegal robocalls.

Smithville Communications is a small service provider with slightly more than 14,000 access lines. Our service territory is limited to a few counties in the state of Indiana. As such, we are familiar with our customers and have a designated Business Representative that handles our relationship with business customers who, if any, are high-volume originators of calls. Smithville also maintains call logs and tracks on a regular basis the number and length of calls traveling over its SIP and TDM trunks. If Smithville discovers through a review of call logs or traceback of behaviors that any customer is exhibiting unusual calling behavior in originating excessive calls, or Smithville receives a complaint about a Smithville customer originating excessive calls,

Smithville will contact that customer to determine whether any suspected illegal robocalling is taking place. Smithville will then take mitigating steps as necessary and as described above.

Any special requirements for Smithville customer call traffic that are determined to be lawful uses will be documented and handled on a case-by-case basis. If necessary, special contracts will be established clarifying the proper uses of call origination services, and service will be terminated for abuses. Smithville has also been actively converting their voice subscribers to SIP format in anticipation for STIR/SHAKEN. To prevent unwanted registrations, we only allow 1 registration per subscriber.

Technological Advances and Upgrades for STIR/SHAKEN

Smithville Communications will continue to monitor the industry for any technological advancements or upgrades in the implementation of STIR/SHAKEN including participating in relevant classes and online webinars.

Smithville Communications also will continue to evaluate its own network and those of our upstream carriers for the feasibility of implementing a full SIP network for our call traffic. Smithville is committed to protecting our customers from illegal robocalls by utilizing the most effective resources available that are compatible with our network and are financially reasonable.

To that extent most trunks are still TDM and would require the carriers to request SIP connections. Smithville Communications is slowly converting our subs from GR303 to SIP.

Other Robocall Mitigation Methods for Customers

Smithville Communications also employs other measures to help protect customers from unwanted robocalls. The company offers two calling features: Telemarketer Block and Anonymous Call Rejection. We also actively monitor registration attempts for our SIP service and block IPs of out of our area ranges.

Smithville Communications Inc. has fully implemented the STIR/SHAKEN caller ID authentication framework.