

Robocall Mitigation Plan

February 17, 2026

Smithville Telecom LLC, 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 Telecom LLC had slightly more than 2,400 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. Stir/Shaken has been fully implemented.

Although Smithville Telecom LLC has some limited capability to send/receive calls via Internet Protocol, the majority of its voice call traffic still travels over TDM trunks to enter and exit our network through intermediate providers. We are currently utilizing Call Guardian through TNS and Metaswitch. To that end, Smithville Telecom LLC submits this robocall mitigation plan, which is designed to comply with the Federal Communications Commission's Eighth Report and Order regarding "that all of the calls that it originates on its network are subject to a robocall mitigation program consistent with 47 CFR § 64.6305(a), which shall include reasonable steps to avoid originating illegal robocall traffic and shall include a commitment to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls. The filer also certifies that any prior certification has not been removed by Commission action and it has not been prohibited from filing in the Robocall Mitigation Database by the Commission, and that it has fully implemented the STIR/SHAKEN authentication framework across its entire network and all calls it originates are compliant with 47 CFR § 64.6301(a)(1) and (2)."

The FCC 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 Telecom LLC's action steps/commitments in turn.

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 Telecom LLC commits to respond fully and within 24 hours to all traceback requests from the groups listed above. And to cooperate with such entities in investigating and stopping illegal robocallers that use its service to organize, carry, or process illegal robocalls. To facilitate this response, Smithville Telecom LLC will maintain a designated point or points of contact to handle traceback requests. As of the initial writing of this plan, those points of contact are:

Jon Schwab
Manage, Network
Operations
1600 W Temperance St.
Ellettsville IN 47429
(812) 876-2211
jon.schwab@smithville.com

Jason Dauby
Chief Technology Officer
1600 W Temperance St
Ellettsville IN 47429
(812) 935-2359
jason.dauby@smithville.com

These points of contact and contact information will be updated as necessary. In responding to traceback requests, Smithville Telecom LLC 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: Upstream Provider

Smithville Telecom LLC 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 Customers

Smithville Telecom LLC 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 Telecom LLC is a small service provider with slightly more than 2,400 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 Telecom LLC 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 Telecom LLC 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 Telecom LLC is slowly converting our subs from GR303 to SIP.

Smithville Telecom LLC. has fully implemented the STIR/SHAKEN caller ID authentication framework.