



Robocall Mitigation Plan

February 17, 2026

Rice Belt Telephone Company Inc., headquartered in Weiner, Arkansas which 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, Rice Belt Telephone Company Inc. had slightly more than 430 access lines. Our goal is to keep all Rice Belt Telephone customers from originating illegal robocalls and to protect our customers from receiving illegal robocalls as much as possible.

Rice Belt Telephone Company Inc. 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 and Stir Shaken through TNS and Metaswitch. To that end, Rice Belt Telephone Company Inc. submits this robocall mitigation plan, which is designed to comply with the Federal Communications Commission's eighth Report and Order (FCC 24-73) regarding "Advanced Methods To Target and Eliminate Unlawful Robocalls." Rice Belt Telephone Company Inc. 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 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 Rice Belt Telephone Company Inc.'s action steps/commitments in turn. As well as any additional requirements identified in the latest (6th) order from the FCC.

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. Rice Belt Telephone Company Inc. 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 originate, carry or process illegal robocalls. To facilitate this response, Rice Belt Telephone Company Inc. will maintain a designated point or points of contact to handle traceback requests. Those points of contact are:

Dustin Easter
Combo Tech
228 Kings Highway
PO Box 338

Tom Walden
General Manager
228 Kings Highway
PO Box 338



(870)684-2288

dustin.easter@ricebelt.net

(870)684-2288

tom.walden@ricebelt.net

These points of contact and contact information will be updated as necessary. In responding to traceback requests, Rice Belt Telephone Company Inc. will employ the tools at its disposal. Rice Belt Telephone 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. And have the ability to go back 15 days in call logs. In summary, we can gather information as to whether a call originated or terminated to a specific Rice Belt Telephone customer, and whether a call entered or exited our switch on a specific trunk and Trunk Circuit Identification Code assigned to another carrier. We do have access to see Numbers that may be flagged that Ricebelt owns and take steps to ensure that these legitimately have a bad rating or if they are rated bad in error. 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

Rice Belt Telephone Company Inc. is committed to mitigating illegal traffic on its network. As such, Rice Belt Telephone will take decisive action when notified by the Commission of suspected illegal calls. When Rice Belt Telephone receives notice from the Commission of suspected illegal calls, Rice Belt Telephone 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 Rice Belt Telephone'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, Rice Belt Telephone 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 Rice Belt Telephone customer claims that its traffic is legal when that traffic has been flagged by the Commission, Rice Belt Telephone will require documented proof of prior express written consent from any called parties. Rice Belt Telephone 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, Rice Belt Telephone will take steps to mitigate that traffic according to the origin of the traffic on Rice Belt Telephone'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 Rice Belt Telephone 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. Rice Belt Telephone will notify the upstream provider that Rice Belt Telephone, 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 Rice Belt Telephone's network, Rice Belt Telephone will block that problem provider's traffic until that provider ceases to send illegal robocalls. If Rice Belt Telephone determines that the illegal traffic originated from a Rice Belt Telephone customer, Rice Belt Telephone 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 Rice Belt Telephone'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

Rice Belt Telephone Company Inc. 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. Rice Belt Telephone 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 Rice Belt Telephone customer from originating calls with a spoofed caller ID number. When our Metaswitch softswitch determines that a Rice Belt Telephone 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 the best protective measure that a voice service provider can implement to prevent illegal robocalls.

Rice Belt Telephone Company Inc. is a small service provider with slightly more than 400 access lines. Our service territory is limited to one county in the state of Arkansas. 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. Rice Belt Telephone also maintains call logs and tracks on a regular basis the number and length of calls traveling over its SIP and TDM trunks. If Rice Belt Telephone discovers through a review of call logs or traceback of behaviors that any customer is exhibiting unusual calling behavior in originating excessive calls, or Rice Belt Telephone receives a complaint about a Rice Belt Telephone customer originating excessive calls, Rice Belt Telephone will contact that customer to determine whether any suspected illegal robocalling is taking place. Rice Belt Telephone will then take mitigating steps as necessary and as described above.

Any special requirements for Rice Belt Telephone 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. Rice Belt Telephone 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

Rice Belt Telephone Company Inc. 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.

Rice Belt Telephone Company Inc. 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. Rice Belt Telephone 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.

Other Robocall Mitigation Methods for Customers

Rice Belt Telephone Company Inc. 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.

Rice Belt Telephone Co. has fully implemented the STIR/SHAKEN caller ID authentication framework.