

ROBOCALL MITIGATION PROGRAM

“Hamilton County Telephone Co-op” (“HCTC”) has implemented the following Robocall Mitigation Program to detect and prevent unlawful robocalls from originating on its network.

All calls that originate on “HCTC’s” network are subject to the described robocall mitigation program.

“HCTC” has contracted with Ribbon Communications (“Vendor” or “Ribbon”), utilizing Call Trust Originating Robocall Mitigation Solution to provide robocall analytics and reputation scoring of our network’s outbound traffic. The vendor’s analytics identify patterns of suspected illegal robocalls and scores the calls based on their behavior and/or their status as suspected robocalls, reported to the Federal Communications Commission (FCC), Federal Trade Commission (FTC), and by other carriers. “HCTC” has access to the vendor’s portal for notifications and reporting about telephone numbers originating calls suspected of illegal robocalls on its network, including from unassigned, inactive and do- not-originate TNs. “HCTC” can also receive reports and alerts if any of its numbers experience a change in reputation such as suspicious traffic patterns or other detected anomalies outside the normal behavior of our company’s traffic. “HCTC” will examine the reports and investigate and identify the source of the calls, as either unlawful or legitimate.

Enforcement

If it is determined that a “HCTC” customer is originating prohibited unlawful robocalls on our network, “HCTC” will terminate their service, as allowed by HCTC’s telephone service policy.

Know your Customer

“HCTC” has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. “HCTC” 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.

Upstream Provider Knowledge

“HCTC” knows all the carriers from which it receives traffic and has confirmed that the carriers are listed in the Robocall Mitigation Database. No provider is using “HCTC’s” network to carry or process a high volume of illegal traffic. In addition, “HCTC” is now incorporating traceback and prohibited traffic language in all contractual agreements with upstream carriers.

Traceback

“HCTC” commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robo-callers that we learn are using our service to originate calls. “HCTC” will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium fully and in a timely manner within twenty-four (24) hours.