

Decatur Telephone Company, Inc. ROBOCALL MITIGATION PLAN

STIR/SHAKEN Continuing Extension

Decatur Telephone Company, Inc. (Decatur) is eligible for the continuing extension of the STIR/SHAKEN implementation deadline on Non-IP networks as a small voice service provider (§64.6304 (a)(2) that has non-IP portions within its network §64.6304(d).

Decatur Telephone Company, Inc. provides local service to fewer than 100,000 voice subscriber lines. All customers are served on Decatur Telephone Company, Inc.'s non-IP network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

Consistent with § 64.6303 (a)(1), Decatur Telephone Company, Inc. is ready to upgrade its entire network to allow for the initiation, maintenance, and termination of SIP calls and fully implement the STIR/SHAKEN framework. However, Decatur Telephone Company, Inc.'s non-IP network is connected to carriers that do not support IP connectivity; therefore, Decatur Telephone Company, Inc. cannot upgrade those Non-IP portions of its network to IP connectivity.

Robocall Mitigation Plan

All voice traffic that originates on Decatur Telephone Company, Inc.'s network is subject to the following Robocall Mitigation Plan.

Call Analytics

Decatur Telephone Company, Inc. has not contracted with a vendor to provide robocall analytics and reputation scoring of our network's outbound traffic.

Internal Traffic Monitoring & Analytics

Decatur Telephone Company, Inc. internally monitors all originating network traffic for suspicious or abnormal call pattern, volume or activity. Calls that meet the below qualifying factors are investigated internally to determine if the calls are legitimate or unlawful:

- High-volume voice network traffic
- Large bursts of calls in a short timeframe
- Short duration calls
- Low average call duration
- Low call completion ratios
- Sequential dialing patterns
- Neighbor spoofing patterns

Decatur Telephone Company, Inc. blocks the origination of calls from unassigned telephone numbers out of its assigned NPA-NXX inventory and calls originating from numbers that are not valid NANP numbers.

Investigation

Decatur Telephone Company, Inc. investigates calls identified by its internal traffic monitoring as suspicious calls or those that have abnormal call volumes, patterns or activity consistent with illegal robocalls.

In addition, if Decatur Telephone Company, Inc. has any other reason to suspect illegal robocalling or spoofing is taking place over its network, Decatur Telephone Company, Inc. will work internally to identify the party that is using our network to originate, route, or terminate such calls and take appropriate action.

Enforcement

Illegal robocalls and fraudulent spoofing is prohibited on our network. If it is determined a Decatur Telephone Company, Inc. customer is using our network to fraudulently spoof calls or to originate illegal robocalls, Decatur Telephone Company, Inc. will either warn the customer to stop such practices or terminate their service as allowed per Decatur Telephone Company, Inc.'s service policy.

Know your Customer

Decatur Telephone Company, Inc. has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Decatur Telephone Company, Inc. 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

Decatur Telephone Company, Inc. knows all the carriers from which it receives traffic and has confirmed that all the carriers are listed in the Robocall Mitigation Database. No provider is using Decatur Telephone Company, Inc.'s network to carry or process a high volume of illegal traffic. Decatur Telephone Company, Inc. monitors incoming traffic from all connected carriers for suspicious call patterns indicative of illegal robocall activity. The connected carriers are made aware of any suspicious or illegal traffic and notified that, if the traffic does not cease, the calls may be blocked from entering Decatur Telephone Company, Inc.'s network. In addition, Decatur Telephone Company, Inc. is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.

Traceback

Decatur Telephone Company, Inc. commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to originate calls. Decatur Telephone Company,

Inc. commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within twenty-four (24) hours.

Robocall Mitigation Database Eligibility

Decatur Telephone Company, Inc. has not been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling.

Decatur Telephone Company, Inc. has not been prohibited from filing in the Robocall Mitigation Database.