

**HAYNEVILLE FIBER TRANSPORT, INC
D/B/A CAMELLIA COMMUNICATIONS.
ROBOCALL MITIGATION PLAN**

Hayneville Fiber Transport, Inc.
d/b/a Camellia Communications.
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Greenville, Alabama 36037

Principals of Company:

Karen Jackson-Furman, CEO & President
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Affiliates, Subsidiaries and Parent Companies:

West Kentucky Rural Telephone Cooperative Corporation, Inc. (WK&T) – Ultimate Parent Company
Synergy Technology Partners, Incorporated (STP) – Parent Company
Ardmore Telephone Company Incorporated (ATC) – Affiliate Company
Telecom Management Services, Inc. (TMS) – Affiliate Company
Hayneville Holding Company, Inc. (HHC) – Parent Company
Hayneville Fiber Transport, Inc. (HFT) – Affiliate Company
Hayneville Telephone Company, Inc. (HTC)-Affiliate Company

Karen Jackson Furman is the President of HTC. Karen Jackson-Furman serves as CEO of HTC. HHC has managing control of HTC and all its affiliates and subsidiaries. HFT is an affiliate of HTC. HTC is owned by HHC. The parent company of HTC is HHC. STP has managing control of HHC. ATC is an affiliate of HHC. ATC is owned by STP. The parent company of both HHC and ATC is STP. WK&T has managing control of STP. TMS is an affiliate of STP. STP is owned by WK&T. The parent of STP is WK&T.

Hayneville Fiber Transport, Inc. d/b/a Camellia Communications. (Camellia) Operating Company Number 753A, is eligible for the continuing extension of the STIR SHAKEN implementation deadline as a small voice service provider (§64.6304 (a)(2) that has non-IP portions within its network §64.6304(d).

Hayneville Fiber Transport, Inc d/b/a Camellia Communications. provides local service to 1,414 customers, fewer than 100,000 voice subscriber lines. 1,414 customers are served on the non-IP portions of Camellia's network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls. Service Provider has attempted to connect via SIP with connected carriers.

Camellia has revised and implemented the following Robocall Mitigation Plan to detect and prevent unlawful robocalls from originating on its network as of February 2024.

All calls that originate on Camellia's network are subject to the robocall mitigation program.

Traffic Monitoring & Analytics

Hayneville Fiber Transport, Inc. ("Camellia") blocks calls originating from numbers that are not valid North American Numbering Plan (NANP) numbers, and numbers not assigned to a Camellia subscriber or otherwise set aside for outbound call use. Camellia does not permit subscribers or SIP trunk users to place outbound calls from "unscreened" numbers. Camellia does not allow a customer to place an outbound call using a telephone number unless they have ported the telephone number to Camellia, or else they have ordered a new telephone number provided exclusively by Camellia.

Using vendor services provided by Trans Nexus. Camellia monitors long-distance originating network traffic for suspicious or abnormal call volume or activity. Long Distance 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
- High-volume calls to premium destinations

When suspicious activity is detected, the Network Operations Center & Engineering Team is notified, who investigates suspicious outbound calling activity.

Camellia also originates calls via SIP connections within its network. Camellia has registered with the Policy Administrator and is an authorized service provider in the STIR|SHAKEN ecosystem. Camellia has implemented STIR|SHAKEN within its IP-network and signs the calls originating on the IP portions of Camellia's network with the Camellia certificate.

Camellia has contracted with Trans Nexus to provide robocall analytics and reputation scoring of our network's outbound traffic. The vendor uses software to monitor outbound voice traffic in real time and provides detailed reporting identifying if our network originates any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. Camellia has access to the vendor's portal and receives daily notifications about telephone numbers originating suspected illegal robocalls on its network. The software's identification of suspected illegal robocalls, and alerts helps prevent the origination of illegal robocalls.

Camellia also blocks the origination of calls from telephone numbers on its internal Do Not Originate (DNO) list.

Camellia files monthly reports with the Reassigned Numbers Database. The database is updated monthly with disconnected numbers, reports are submitted even if the report shows no disconnects.

Investigation

Camellia puts a high priority on cooperation with traceback requests initiated by the FCC-Authorized Industry Traceback Group. Camellia is committed to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocalls that we learn are using our service to originate calls. Camellia 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.

Customers are required to assist in traceback investigations. Camellia has a single point of contact designated to handle traceback requests and coordinate with outside investigations.

Camellia investigates calls identified by its analytics vendor and/or internal traffic monitoring as suspicious calls or those that have abnormal call volumes, patterns, or activity consistent with illegal robocalls.

Camellia is dedicated to investigating and mitigating illegal robocall traffic that is brought to the providers' attention through measures such as internal monitoring and tracebacks. Every reasonable step will be taken in this case.

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

Robocall Mitigation Database Eligibility

Camellia has not been involved in any recent formal law enforcement or regulatory investigation into suspected unlawful robocalling.

Camellia has not been prohibited from filing in the Robocall Mitigation Database (RMD).

Upstream Provider Knowledge

Camellia knows all the carriers from which it receives traffic.

Camellia has confirmed that all its connected carriers are listed in the Robocall Mitigation Database.

Camellia has reviewed the connected carrier's RMPs to learn how the carriers monitor their originating traffic to mitigate illegal robocalls.

Camellia is now incorporating traceback and prohibited traffic language in all contractual agreements with upstream carriers.

Camellia does not directly receive traffic from any foreign originating or intermediate provider. No provider is using Camellia's network to carry or process a high volume of illegal traffic.

Role In the Call Chain

Camellia is a voice service provider with a STIR/SHAKEN implementation obligation on the IP-Portions of its network. Camellia is also a voice service provider without a STIR/SHAKEN obligation on the non-IP portions of its network because that portion of Camellia's network relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

Know Your Customer Policies

Camellia services small and medium businesses and residential customers, as well as municipalities. Camellia does not have VoIP wholesale customers. Camellia does not allow foreign entities (i.e., those based permanently outside the United States) to connect directly to the network to place outbound calls. However, US-based clients may travel to use services outside the United States in compliance with laws and regulations. To prevent spoofing, Camellia collects and verifies information for each commercial customer, including details such as the physical business location, contact persons, and federal tax ID. Camellia verifies government-issued identification for every customer. Camellia also collects the nature of the company's business. This information is collected during the initial agreement stage.

Camellia has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Camellia thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new services or making changes to existing services.

Residential customers are asked to provide their full name, address (physical and mailing, if different), last four digits of their social security number, date of birth, phone number, email, and establish a security question, and a password. Business customers are asked to provide their full name, address (physical and mailing, if different), tax identification number, phone number, email, and establish a security question, and a password. To initiate an account change, a customer must provide their password or the answer to their security question prior to initiating a change. If the customer is unable to provide that information the customer service representative will call the customer back using the number, they provided at account setup. Camellia also requires a photo ID for all new customers requesting voice service.

Call Routing Policies and Reasonable Analytics

Legitimate robocalls who are placing calls in compliance with all regulations, including those placing outbound emergency notifications, appointment reminders, school, and church closing announcements, have notified Camellia of their intended use. Camellia has systems that prevent calls from being placed from numbers that are not active in the North American Numbering Plan.

Customer Inbound Nuisance Calling Prevention

Camellia offers features to subscribers that allow certain inbound nuisance calls to be blocked to reduce the amount of inbound calling, including telemarketing do not disturb and anonymous

call rejection. Camellia's subscribers can block calls from specific inbound calls using Selective Call Rejection.

Enforcement

If it is determined a Camellia customer is originating prohibited unlawful robocalls on our network, Camellia will either warn the customer to stop or terminate their service as allowed per Camellia's policies that define the circumstances by which Camellia will suspend or terminate service to a customer.

Fraudulent spoofing is prohibited on our network. If it is determined a Camellia customer is using our network to fraudulently spoof calls, Camellia will either warn the customer to stop such practices or terminate their service as allowed per Camellia policy.

All Camellia customers sign a service agreement / application before the new service is activated, or existing service is renewed. The service arrangement/ application includes notice that Camellia prohibits use of its network for the initiation of fraudulent spoofing and robocalls and if end users are found in violation of the service terms, the end user's service may be terminated.

Customer Education

Camellia posts information on its website: victim of unlawful robocalls and a process to report complaints related to robocall activity.