



Robocall Mitigation Plan

Know Your Customer

We follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

Traceback

We respond to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls.

STIR/SHAKEN

We sign outbound off-network traffic calls with STIR SHAKEN certificates

All the voice traffic that originates on our network is subject to the robocall mitigation program described below.

Robocall Mitigation Program

We use software provided by TransNexus to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts us if we originate 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. We immediately investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If we determine that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as appropriate.

Cal-Ore Telephone:

1. Responds to traceback requests from the FCC, civil and criminal law enforcement, and the Consortium in a timely manner in order to ensure that the FCC and law enforcement have information necessary to combat illegal robocalling.
2. Takes steps to mitigate illegal traffic when notified by the Enforcement Bureau.
3. Takes affirmative, effective measures to prevent new and existing customers from making originating illegal robocalls.

5. Applies due diligence related to reviewing call volumes.

6. Company's Terms and Conditions state: "The provision of voice service by the company assumes that only legitimate calls will be originated or terminated. It is illegal when a caller transmits misleading or inaccurate caller ID information with the intent to defraud, cause harm, or wrongly obtain anything of value. The company will cooperate with the Federal Communications Commission and law enforcement to provide them information necessary to mitigate illegal traffic."

7. Amends contracts, as deemed appropriate, to prohibit illegal mass calling with the right to disconnect service.

a. The Company is aware that there certainly are legitimate reasons why businesses make outbound robocalls.

b. The Company is reviewing how to effectively increase background checks and contractually identify traffic limits for new customers and in order to allow "legitimate" robocalling.

8. Every effort is made, to the best of our abilities, to block a call if it is highly likely to be illegitimate such as:

a. The originating telephone number should be network-blocked because it shows up a Do-Not-Originate list or is an unallocated, unused, or invalid number.

b. Because reasonable analytics indicated the call is likely malicious in intent. For example, a significant change in a business' originating traffic patterns to suddenly become high volume, very short duration calls might indicate they have been hacked.