

Dunkerton Telephone Cooperative, DBA Dunkerton Communications

Robocall Mitigation Plan

Traceback Cooperation

- Dunkerton Telephone Cooperative DBA Dunkerton Communications will cooperate in traceback investigations. To allow for timely and comprehensive law enforcement efforts against illegal robocallers, Dunkerton Telephone Cooperative will dedicate sufficient resources to provide prompt and complete responses to traceback requests from law enforcement and from USTelecom's Industry Traceback Group. Dunkerton Telephone Cooperative has identified a single point of contact in charge of responding to these traceback requests and will respond to traceback requests as soon as possible within 24 hours not to include weekends or holidays.
- Dunkerton Telephone Cooperative will require traceback cooperation. For all new and renegotiated contracts governing the transport of voice calls, our web policy will specify the use of best efforts to require cooperation in traceback investigations by identifying the upstream provider from which the suspected illegal robocall entered its network or by identifying our own customer if the call originated in our network.

Subscriber Vetting Practices

- Residential and small business practices
 - Dunkerton Telephone Cooperative will vet residential and small businesses through normal business practices and will obtain billing address, primary residence, or business location.
- Commercial retail end-users
 - Dunkerton Telephone Cooperative will confirm the identity of commercial customers by collecting information such as physical business location, contact person(s), state or country of incorporation, federal tax ID, and the nature of the customer's business.
 - Dunkerton Telephone Cooperative has call detail records to determine typical call volume and potential reasons for significant deviations from the typical call volume. Dunkerton Telephone Cooperative will determine if there are legitimate reasons for any customer to be making a number of high volume, short duration calls. Dunkerton Telephone Cooperative will contact any commercial business within 24 hours of any complaint or deviations to determine if call volumes are legitimate.

Telephone Number Validation Practices

- Telephone Number Validation is necessary and appropriate when an End-User's right-to-use the telephone number is unknown to the VSP. Dunkerton Telephone Cooperative will validate as necessary and appropriate.

Ongoing Mitigation Practice

- Dunkerton Telephone Cooperative will investigate suspicious calls and calling patterns. If Dunkerton Telephone Cooperative detects a pattern consistent with illegal robocalls, or if Dunkerton Telephone Cooperative otherwise has reason to suspect illegal robocalling or spoofing is taking place over our network, Dunkerton Telephone Cooperative will seek to identify the party that is using our network to originate, route, or terminate these calls and take appropriate action. Taking appropriate action may include, but is not limited to, initiating a traceback investigation, verifying that the originating commercial customer owns or is authorized to use the Caller ID number, determining whether the Caller ID name sent to a receiving party matches the customer's corporate name, trademark, or d/b/a name, terminating the party's ability to originate, route, or terminate calls on its network, and notifying law enforcement authorities.
- Dunkerton Telephone Cooperative utilizes a third-party "Analytics" platform jointly provided by TransNexus and Aureon to support the effectiveness of its Robocall Mitigation Plan. This includes, as examples, the use of "Telecom Fraud Prevention" and "Robocall and Telephone Denial of Service (TDos) Prevention" services, which include more specifically the use of the following methods/tools as a means of preventing and blocking fraudulent and illegal robocalls on its network: the use of CDRs and related reports for determining mitigation actions; use of SIP Analytics enabling real time traffic analysis and detection and mitigation of robocalls at origination; use of blacklisting and whitelisting to mitigate calls with specific attributes; use of CAPTCHA gateway services to distinguish whether calls are from humans or autodialers; use of a "Shield" database that screens calls at origination for calling numbers that are invalid, high-risk, or appear on "Do Not Originate" lists; and use of reputation look up services on calling numbers at origination.

Traceback Request Single Point of Contact:

Name: Abbi Kienast

Title: General Manager

Phone Number: 319-822.4512

Email Address: abbi@dunkerton.net

Upstream Provider Information:

Name of Upstream Provider: Aureon

Nature of Business: Tandem Switch Provider; Wholesale Long-Distance Provider

Network Location of Upstream Provider: West Des Moines, IA

Name of contact: Mark Timm

Title: Switch Engineer

Phone Number: 515-830-0408

Email Address: Mark.timm@aureon.com