



Pioneer Telephone Company

P.O. Box 207 • LaCrosse, WA 99143
Phone: 509-549-3511 • Fax: 509-549-3514

Serving LaCrosse, Endicott, Winona, Hooper, Dusty, and Hay

ROBOCALL MITIGATION PLAN/ DNO LIST POLICY

Pioneer Telephone Company ("PTC" or the "Company") is considered a small voice service provider under Section 64.6304(a)(2) of the Federal Communications Commission's (FCC) rules. Headquarters based at 215 S. Main Street, LaCrosse, WA 99143.

DESCRIPTION OF ROBOCALL MITIGATION /DO NOT ORIGINATE LIST POLICY

PTC has put real effort into upgrading its network and adding features to help stop illegal robocalls. Every call that starts on or passes through the Company's network is part of a robocall mitigation program with clear practices aimed at greatly reducing the chance of illegal robocalls being made, processed, or carried. The company uses multiple systems to spot potential robocall activity and has created this Robocall Mitigation Plan/DNO List Policy ("the Plan") to show how it actively works to prevent both new and existing customers from making illegal calls, in line with FCC rules.

1. Know our Customers

- The identity of the Company's subscribers is vetted via the application process to ensure valid use of telephone number resources.
- Caller ID information is verified, and subscribers are not granted the right to send nontrusted subscriber information.
- The Company does not sell services to international call originators.
- The Company does not sell services to subscribers outside of its physical service territory.
- The Company subscribers are required to have a physical connection to its network.
- As an originating voice service provider, all telephone numbers that are capable of originating calls on the Company's network are assigned by the only the Company employees.

2. Know our Upstream Provider

- The Company has confirmed that its upstream provider has a certification in the Robocall Mitigation Database.
- The Company does not accept voice traffic from an uncertified provider.

3. Stir/Shaken

- The Company is working with Inteliquent to implement Stir/Shaken Certification process.
- The Company is working with Eastwind to inspect all inbound/ outbound calls and ensure they have proper identifying certification before the traffic is allowed to terminate.
- The Company has deployed calling special features within our Soft Switch for real-time analytics that trigger an announcement if it suspects fraudulent calling of excessive call volumes is taking place



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4. Traceback

- Pioneer Telephone Company is committed to responding to all traceback requests from the Commission, law enforcement and the registered traceback consortium. We will cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls.

5. Monitoring

- The Company currently observes peg counts from their switch and calling reports from their billing system to monitor excessive call volumes.
- The Company has implemented a practice of promptly investigating calls identified by or to it as suspicious, so as to determine if the caller was attempting to originate unlawful robocalls.
- The Company personnel will investigate any callers that appear to be initiating illegal robocalls and will take measures to block that subscriber's ability to place illegal robocalls.
- The Company is using multiple platforms to monitor excessive call volumes and repeated calls and they are alerted if any such calling is found.

6. Do Not Originate List (DNO)

- The Company in order to stay in compliance with the FCC "reasonable" DNO list, or "blacklist for outbound calls" flags numbers that should not be used to make outbound calls. This includes numbers meant only for incoming calls, like government hotlines (509-549-9000) or customer service lines (509-549-HELP and 509-549-MAIL). The goal is to stop calls that seem to come from these numbers, since scammers often spoof them to trick people into answering local calls.
- The FCC defines four types of numbers that can be placed on a Do Not Originate (DNO) list. These include:
 - I. Invalid numbers, which are numbers not assigned to any subscriber.
 - II. Unallocated numbers, which are reserved numbers but are suspended
 - III. Inbound-only numbers, meant solely for receiving calls and not for making them.
 - IV. Numbers linked to fraud, reported as being used in scams or other fraudulent activities.
- The Company has implemented DNO within the options of our Customer Calling Features of our switch (C15). Deney Originating (DOR) calling feature blocks all Originating Traffic on a Gateway Device that is not assigned to a subscriber.
- The Company has limited directory numbers that are in a suspended (SUS) status, these are unallocated numbers that are assigned to a Gateway but are not an active subscriber, to only allow originating traffic to emergency numbers 911 and 899, and these numbers can also only place outgoing calls to the Pioneer Telephone office number 509-549-3511.



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- The Company's soft switch does not allow calls to be made from unassigned numbers nor any type of spoofing of numbers from residential lines.
- The Company has also included special billing features in the identity header of all originating calls from our network, this setup allows us to send the original calling number out within the identity header if the subscriber has call forward option on their line.
- The Company has implemented the necessary steps and maintains a list of all DOR (Deney Originating) Unassigned /Suspended numbers within our network.

Pioneer Telephone Company

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