

February 12, 2024

Robocall Mitigation Plan

STIR/SHAKEN Compliance

Southwest Arkansas Telephone Co-op Inc. subscribes to Ribbon's STIR/SHAKEN as a Service which provides us access to a complete STIR/SHAKEN solution. We use Ribbon's service for the Secure Telephone Identity – Authentication Service and the Secure Telephone Identity – Verification Service functions. We have our own STIR/SHAKEN certificate which is issued by Ribbon.

Robocall Mitigation Compliance - IDH

Southwest Arkansas Telephone Co-op Inc. has deployed Ribbon Communications Call Trust Originating Robocall Mitigation Solution to monitor against suspicious calling activities including high call volumes and illegal robocalls. Ribbon Identity Hub Reputation Scoring can detect and mitigate illegal Robocalls in real time by detecting calls from callers matching Do Not Originate lists, unassigned or unallocated numbers, and databases containing known robocall numbers.

Robocall Mitigation Compliance - Analytics

Southwest Arkansas Telephone Co-op Inc. has deployed Ribbon Analytics Solution. Call monitoring is continuous and automated and a report of high-volume callers is produced daily for review by designated employees. Call patterns that are flagged as suspicious are reviewed by a designated employee. If *Southwest Arkansas Telephone Co-op Inc.* cannot satisfactorily resolve the reason for the flagged traffic, or fails to get cooperation from the end user, it will implement on short notice mitigation activities including suspension/reduction/termination of service on a reasonable notice.

Traceback Requests

Southwest Arkansas Telephone Co-op Inc. is fully committed to responding in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium. All robocall traceback requests should be forwarded to swatco@swatco.com.

Know Your Customer

Southwest Arkansas Telephone Co-op Inc. has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. *Southwest Arkansas Telephone Co-op 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. All end users receive access to *Southwest Arkansas Telephone Co-op Inc.'s* Terms of Service agreement when new service is activated or existing service is renewed. The Terms of Service arrangement includes notice that *Southwest Arkansas Telephone Co-op Inc.* prohibits use of its network for the initiation of fraudulent spoofing and robocalls. If end users are found in violation of the service terms, the end user's service may be terminated.

Know Your Upstream Providers

Southwest Arkansas Telephone Co-op Inc. knows all carriers with which it exchanges traffic. ***Southwest Arkansas Telephone Co-op Inc.*** via the Ribbon IDH cloud solution, proactively monitors incoming traffic from all connected carriers for suspicious calls. The connected carriers are made aware of any suspicious or illegal traffic identified and notified, that if the traffic does not cease, the calls may be blocked from entering ***Southwest Arkansas Telephone Co-op Inc.'s*** network to terminate. ***Southwest Arkansas Telephone Co-op Inc.*** has confirmed that all carriers in which ***Southwest Arkansas Telephone Co-op Inc.*** exchanges traffic and from which ***Southwest Arkansas Telephone Co-op Inc.*** receives traffic are listed in the Robocall Mitigation Database.

Robocall Mitigation Database Eligibility

Southwest Arkansas Telephone Co-op Inc. has not been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling. ***Southwest Arkansas Telephone Co-op Inc.*** has not been prohibited from filing in the Robocall Mitigation Database.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lane Powers', followed by a long horizontal flourish.

Lane Powers
VP Network Administration