



**Cumby Telephone Cooperative, Inc.
Robocall Mitigation Program**

This Robocall Mitigation Plan describes the specific reasonable steps that Cumby Telephone Cooperative, Inc. ("Cumby") has taken to avoid the origination, carrying, or processing of illegal robocall traffic on its network.

Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Robocalls

Cumby has a "know-your-customer" policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. Cumby vets the identity of all new residential and business customers. Cumby's business customers are mostly small businesses and all are physically located in our service territory. Prior to a new business customer making a call on Cumby's network, we personally know, or get to know, the business owners and/or management. This personal touch gives Cumby a clear view of whether or not the business is a risk for originating illegal robocalls.

Although Cumby's customers generally do not generate a high volume of calls, were Cumby to receive a request for high-volume origination services, it would exercise caution and extensively investigate such customers before granting access to the services. Specifically, we would collect information such as their physical business location, contact person(s), state or country of incorporation, federal tax ID, and the general nature of their business.

In addition, all Cumby customers are only able to originate calls from a number that identifies in the company's switches as a number that has been assigned to them. This prevents Cumby's customers from originating calls with a spoofed caller ID number, which greatly mitigates the likelihood of illegal robocalls originating on Cumby's network.

"Know-Your-Upstream Provider" Procedures

Currently, there are only four upstream providers from which Cumby receives traffic: BrightSpeed, Spectrum, AT&T, and Frontier. Cumby's connections with these providers have been in place for many years, and we know these companies very well. However, Cumby exercises due diligence before accepting traffic from any new upstream provider as we seek to ensure that such providers are not using Cumby to carry or process a high volume of illegal traffic. Specifically, Cumby collects information such as the upstream provider's physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of their business.



"Yesterday's Telephone, Tomorrow's Technology"

*InTouch by CumbyTel • PO Box 619 • 201 Frisco • Cumby, TX 75433
PH: 903.994.2211 • Toll Free: 888.994.4604 • Fax: 903.994.2200*



Use of Call Analytics Systems

Cumby presently uses Innovative Systems Terminating Call Manager (TCM) to identify and block incoming illegal robocall traffic. The TCM call screening software stops spoofing of local exchange numbers and provides telemarketer screening, auto-dialers, and other nuisance callers. This service is provided free to our customers.

Commitment to Respond to Traceback Requests

Cumby commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping illegal robocallers that use its service to originate, carry, or process illegal robocalls.



"Yesterday's Telephone, Tomorrow's Technology"

*InTouch by CumbyTel • PO Box 619 • 201 Frisco • Cumby, TX 75433
PH: 903.994.2211 • Toll Free: 888.994.4604 • Fax: 903.994.2200*