

Pine Telephone Company Inc.

STIR/SHAKEN IMPLEMENTATION ROBOCALL MITIGATION CERTIFICATION ROBOCALL MITIGATION PLAN

Pine Telephone Company Inc. (Pine Telephone Company or Company) submits this certification pursuant to section 64.6305(d) of the Federal Communications Commission's (FCC's or Commission's) rules.

STIR/SHAKEN Implementation

Company's role in the call chain is a voice service provider with a STIR/SHAKEN implementation obligation serving end-users on the IP portion of its network.

Pine Telephone has implemented the STIR/SHAKEN authentication framework across the IP portion of our network; all calls that originate on the IP portion of our network are compliant with section 64.6301(a)(1) and (2).

For the non-IP portions of its network, Company is subject to a continuing extension as set forth in section 64.6304(d), which is relevant to those "portions of a voice service provider's network that rely on technology that cannot initiate, maintain, and terminate SIP calls." Pine Telephone is a member of NTCA, which is actively participating in industry efforts to develop a non-IP solution to illegal robocalls.

Identifying and Other Information

Primary address: 210 W. 2nd Street, Broken Bow OK 74728

Other business names in use: Pine Cellular Phones Inc.

Subsidiary: Pine Cellular Phones Inc.

Principals: Jerry Whisenhunt (General Manager); John Callaham (CEO)

All business names previously use: None

Pine Telephone is not a foreign voice service provider.

OCN: 2017

Individual responsible for addressing robocall mitigation-related issues:

Roy Shiro, Switching Manager

Wireless Department:

210 W. 2nd Street, Broken Bow OK 74728

580-584-3300; royshiro@pine-net.com

Pine Telephone has implemented the STIR/SHAKEN authentication framework for all calls on the IP portion of its network.

All calls that originate on Company's network are subject to the attached Robocall Mitigation Plan.

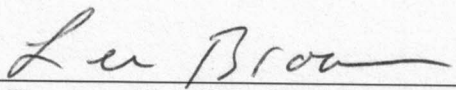
Pine Telephone has never been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program.

Pine Telephone has not been prohibited by the Commission from filing in the Robocall Mitigation Database.

Pine Telephone commits to cooperate with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any robocallers that use our service to originate unlawful robocalls. Pine Telephone will respond fully, within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium.

I, Lee Brown, Chief Technology Officer, for Pine Telephone Company Inc., submit this certification on behalf of the Company, which has implemented the STIR/SHAKEN authentication framework as indicated in the Robocall Mitigation Database.

Pursuant to section 1.16 of the FCC's rules, I certify, under penalty of perjury that the information and statements contained herein are true and correct to the best of my knowledge and belief.



Lee Brown, Chief Technology Officer

Robocall Mitigation

Pine Telephone has taken specific reasonable steps to avoid carrying or processing illegal robocall traffic. Pine Telephone reserves the right to modify and/or supplement its robocall mitigation plan to adapt to risks and to improve the overall effectiveness of its program.

Pine Telephone uses call analytics software provided by Affinity Network, Inc. (ANI). ANI monitor the network to identify and mitigate any irregular traffic patterns to reduce fraudulent and/or illegal robocall traffic. When it identifies potentially fraudulent, abusive, suspicious, or robocalling traffic patterns; it acts swiftly to mitigate this activity. Mitigation includes blocking or rejecting known fraudulent/abusive traffic or invalid calling numbers utilizing the appropriate Session Initiation Protocol (SIP) response codes; blacklisting a known abusive number; tracing the call traffic back to the originating party; and reporting instances of irregular traffic activity to our carrier customer. If the ANI alerts Pine Cellular of suspicious activity, the Company will consider the cause and take action to remediate consistent with our Acceptable Use Policy (AUP), which prohibits utilizing our network for deceptive purposes, engaging in fraudulent activities, and violating local, state, or federal laws. Violators of may be warned to stop the suspicious or unlawful activity and their service may be suspended or terminated.

Know-Your-Customer. Pine Telephone vets new and renewing customers. We will confirm the identity of new or renewing residential and business customers by collecting identifying information including, as applicable, SSN, date of birth, contact person for the business, physical address, state and/or country of incorporation, and federal tax ID. New customers requesting an excessive number of call paths will be screened for legitimate usage needs. New and existing customers with an excessive number of call paths will receive robocall outreach and education materials.

All residential and business customers are only able to place calls originating from their own phone number.

Caller ID and call records are reviewed when service is installed to verify legitimate caller ID information.

Know-Your-Upstream Provider. Pine Telephone knows all carriers from which it receives traffic. Pine Telephone has confirmed that all connected providers are listed in the Robocall Mitigation Database.

Traceback. We will respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and cooperate with such entities in investigating and stopping any robocallers that use our network to originate robocalls.