

ADVANTAGE CELLULAR SYSTEMS, INC.

ROBOCALL MITIGATION PLAN

Advantage Cellular Systems, Inc (ACSI), Operating Company Number 841F is eligible for the continuing extension of the STIR SHAKEN implementation deadline as a small voice service provider (§64.6304 (a)(2) that has non-IP portions within its network §64.6304(d).

ACSI provides local service to fewer than 100,000 voice subscriber lines and has customers served on the non-IP portions of ACSI's network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls. ACSI's non-IP network is connected to carriers that do not support IP connectivity, therefore, ACSI cannot upgrade the non-IP connections to IP connectivity.

To meet the non-IP network criteria for the continuing STIR SHAKEN extension (§ 64.6303 (a)(2)), ACSI is a member of NTCA. NTCA participates on the ATIS PTSC Non-IP Call Authentication Task Force working group which developed the (ATIS Solutions) non-IP call authentication solutions. NTCA is serving as ACSI's third-party representative on the ATIS PTSC Non-IP Call Authentication Task Force working group.

The IP portion of ACSI's network is STIR|SHAKEN compliant. ACSI also originates calls within its network via SIP connection. ACSI has registered with the Policy Administrator (via its parent company DeKalb Telephone Cooperative, Inc.) and is an authorized service provider in the STIR|SHAKEN ecosystem. ACSI has implemented STIR|SHAKEN within its IP-network and signs the calls originating on the IP portion of ACSI's network.

ACSI has implemented the following Robocall Mitigation Plan to detect and prevent unlawful robocalls from originating on its network. All calls that originate on ACSI's network are subject to the described robocall mitigation plan.

Robocall Mitigation Plan

ACSI has contracted with TNS to provide robocall analytics and reputation scoring of our network's TDM outbound traffic. TNS' analytics identify patterns of suspected illegal robocalls and scores the calls based on their behavior and/or their status as suspected robocalls as reported to the Federal Communications Commission (FCC), Federal Trade Commission (FTC), and as reported by other carriers. ACSI has access to the TNS portal and receives notifications about telephone numbers originating suspected illegal robocalls on its network, including from unassigned, inactive and do-not-originate TNs. ACSI also receives reports via email alerts if any of its assigned customer telephone numbers experience a change in reputation such as suspicious traffic patterns or other detected anomalies outside the normal behavior of our company's traffic. ACSI will examine the report and investigate and identify the source of the calls as legitimate or unlawful.

Enforcement

If it is determined that an ACSI customer is originating prohibited unlawful robocalls on its network, ACSI will either warn the customer to stop or terminate their service as allowed per ACSI's policy.

Know Your Customer

ACSI has procedures in place to prevent new and renewing customers from using our network to originate illegal robocalls. ACSI thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new services or making changes to existing services.

All ACSI customers sign a service agreement / application before the new service is activated or existing service is renewed. The service arrangement/ application includes notice that ACSI prohibits use of its network for the initiation of fraudulent spoofing and robocalls and if end users are found in violation of the service terms, the end user's service may be terminated.

Upstream Provider Knowledge

ACSI knows all the carriers from which it receives traffic and has confirmed that all its connected carriers are listed in the Robocall Mitigation Database.

ACSI has also reviewed the connected carrier's RMPs to learn how the carriers monitor their originating traffic to mitigate illegal robocalls.

ACSI, via its call analytics vendor, monitors incoming traffic from all connected carriers for suspicious call patterns indicative of illegal robocall activity. 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 ACSI's network. No provider uses ACSI's network to carry or process a high volume of illegal traffic. In addition, ACSI is now incorporating traceback and prohibited traffic language in all contractual agreements with upstream carriers.

Traceback

ACSI commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocalls that we learn are using our service to originate calls. ACSI will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium fully and in a timely manner within twenty-four (24) hours.

Customer Education

ACSI posts information on its website to educate customers on how to protect themselves from becoming a victim of unlawful robocalls and a process to report complaints related to robocall activity.