

Hager Telecom, Inc.

Robocall Mitigation Plan

Hager Telecom, Inc. dba Bevcomm implemented a Robocall Mitigation Program, required by Section 4(b)(5)(C) of the TRACED Act, and 47 C.F.R. §64.6305, as documented herein.

Hager Telecom's Robocall Mitigation Program as well as the status of its implementation of STIR/SHAKEN practices and procedure it has in place, is described in the following report. Hager Telecom may modify, add, delete, or otherwise alter any of the policies and procedures described in the plan at any time to respond to changes in its business, its capabilities, and its needs.

Know Your Customer

Hager Telecom, Inc. maintains a rigorous "know your customer" process, specifically designed to prevent new and renewed customers from using their network to originate illegal calls. Hager Telecom investigates new and renewing customers seeking access to high-volume origination services and, if necessary and possible, modifies service terms and conditions to mitigate the potential of any new or renewing customer originating illegal robocalls.

Know your Upstream Provider

Hager Telecom, Inc. conducts a due diligence review in advance of accepting a new upstream provider. The review includes the collection of business demographic information and a contact name. If an upstream provider was determined to have a pattern of questionable activity, the provider would be required to remedy the problem or service would be suspended and/or terminated.

Traceback

Hager Telecom, Inc. has processes in place to ensure it responds fully to any traceback request from the FCC, civil or criminal law enforcement agents, and the industry traceback consortium within 24 hours of request. Hager Telecom has designated a traceback response contact(s) who is aware of the traceback requirements in the event the company receives notification of a traceback request.

Hager Telecom, Inc. will respond promptly to inquiries received from the Industry Traceback Group. If a pattern of questionable activity is detected, Hager Telecom will require its customer to remedy the problem and, if effective action is not taken, service to the customer may be suspended and/or terminated.

STIR/SHAKEN

This company is a small rural local exchange carrier operating in the state of Wisconsin and is operating under the extension contained in 47 CFR § 64.6304(d)-for networks where it relies on technology that cannot initiate, maintain, and terminate SIP calls. Hager Telecom, Inc is an end office providing company through a third-party host switch. The company terminates traffic to end users from upstream providers.

All the voice traffic that originates on our network is subject to the robocall mitigation program as described below. Hager Telecom, Inc. has not been the subject of a regulatory or law enforcement investigation related to illegal robocalling. Hager Telecom, Inc., has received notification from the WCB RMD team of a deficient Robocall Mitigation Database filing in April 2025. The deficiencies were regarding the *principal(s)* and *valid OCN*. Hager Telecom, Inc. corrected the deficiencies within the Robocall Mitigation database by the required deadline. No further notifications have been received. The company is not prohibited from filing in the Robocall Mitigation Database.

Robocall Mitigation Program

Hager Telecom, Inc., through its' switching host, West Wisconsin Telcom Cooperative, Inc., is using software provided by TransNexus to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts us if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. We immediately investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If we determine that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as appropriate. The company is working toward a Stir/Shaken solution in the TDM portions of its network as part of a work group affiliation.

Thank you,

/s/ Matt Peterson
Director of Engineering
123 W 7th Street
Blue Earth, MN 56013
507-526-2822
mpeterson@bevcomm.com