



Indianhead Telephone Company, Inc.

Robocall Mitigation Plan

Indianhead Telephone Company, 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.

Indianhead Telephone Company's Robocall Mitigation Program as well as the status of its implementation of STIR/SHAKEN practices and procedure it has in place, are described in the following report. Indianhead Telephone Company 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

Indianhead Telephone Company, Inc. maintains a rigorous "know your customer" process, specifically designed to prevent new and renewing customers from using their network to originate illegal calls. Indianhead Telephone Company 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

Indianhead Telephone Company, 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

Indianhead Telephone Company, 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. Indianhead Telephone Company, Inc. 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.

Indianhead Telephone Company, Inc. will respond promptly to inquiries received from the Industry Traceback Group. If a pattern of questionable activity is detected, Indianhead Telephone Company, Inc. 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 a portion relies on technology that cannot initiate, maintain, and terminate SIP calls. Indianhead Telephone Company, Inc. is an end office providing company. The company terminates traffic to end users from upstream providers. Indianhead Telephone Company does not operate a tandem switch.

Most of the voice traffic that originates on Indianhead Telephone Company, Inc.'s voice network in Wisconsin is authenticated with STIR/SHAKEN. The company has implemented STIR/SHAKEN in partnership with Neustar as the STI-Certificate Authority (STI-CA) service provider for Indianhead Telephone Company, Inc. Neustar will interact with the STI-Policy Administrator (STI-PA) on Indianhead Telephone Company, Inc.'s behalf to ensure that (1) only vetted and approved customers are authorized to sign calls and (2) such customers' calls are signed exclusively with certificates that have been issued at the national level.

The remainder of the voice traffic that originates on our network in Wisconsin is subject to the robocall mitigation program as described below. Indianhead Telephone Company, Inc. has not been the subject of a regulatory or law enforcement investigation related to illegal robocalling. Indianhead Telephone Company, 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*. Indianhead Telephone Company, 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

Indianhead Telephone Company, Inc. implemented 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
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