

MONITOR

TELECOM

February 23, 2024

FCC Wireline Competition Bureau

45 L Street N.E.

Washington DC 20554

RE: Monitor Cooperative Telephone Company Robocall Mitigation Plan

Monitor Cooperative Telephone Company dba Monitor Telecom has taken the following steps to mitigate and avoid illegal robocall traffic originating from their voice services.

Monitor Cooperative Telephone Company does not sell services to international call originators.

Monitor Cooperative Telephone Company does not sell their services to subscribers outside of their physical exchange boundaries.

Monitor Cooperative Telephone Company are required to have a physical connection to their network and all other connections are denied access via security protocols in place.

Monitor Cooperative Telephone Company exercises due diligence to vet providers before accepting traffic from an upstream provider collecting information such as physical location, contact name, federal tax ID and the nature of their business.

Monitor Cooperative Telephone Company Contract / Terms of Service allow Monitor Cooperative Telephone Company to terminate for abuse of service.

The identity of customers is vetted via the Monitor Cooperative Telephone Company application for service processes used to validate new customers.

Monitor Cooperative Telephone Company monitors call origination volume on customers line reviewing call patterns that would exceed thresholds, working with our billing company Mid America Computer Corp. to identify potential issues associated with illegal robocall and fraudulent call patterns.

Monitor Cooperative Telephone Company digital certificate is registered with iConnectiv STI- PA

Monitor Cooperative Telephone Company implemented STIR/SHAKEN in 2023.

Monitor Cooperative Telephone Company commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement and the industry traceback consortium and to cooperative with entities investigating and stopping illegal robocalls that use its service to originate, carry or process illegal robocalls.