

Wabash Mutual Telephone Company

Robocall Mitigation Plan

Version 4

March 31, 2026

1. Purpose of Robocall Mitigation Plan.

Wabash Mutual Telephone Company ("Wabash") is dedicated to stopping illegal robocalls calls from originating on its network and to cooperating with the Federal Communications Commission ("FCC"), law enforcement and the Industry Traceback Group.

This document describes its Robocall Mitigation Plan and "reasonable steps" that are being taken to prevent the origination of illegal robocalls prior to the full implementation of STIR/SHAKEN as required by the TRACED Act and FCC rules.

2. Company Information.

Wabash (OCN 0664) is a small, rural ILEC that serves a study area (SAC 300664) consisting of a single exchange in northwest Ohio. It also operates outside its study area as a CLEC (OCNs 669D and 768H) using the same name and provides voice service in areas near to its exchange. The combined operations of Wabash represent fewer than 5,000 lines, meeting the definition of "small voice service provider" defined in 47 CFR §64.6304(a)(2). Although the central office switch is IP capable, most of Wabash's operations are dependent upon TDM trunks to other carriers.

3. Role in the Call Chain

Wabash is a voice service provider with a STIR/SHAKEN obligation in the IP portion of its network. It still claims exemption for the non-IP portion of its network pursuant to 47 CFR § 64.6304(d). See section 5 of this plan for details of the exemption being claimed.

4. Implementation of STIR/SHAKEN in the IP Portion of its Network.

Effective June 30, 2023, Wabash implemented STIR/SHAKEN in the IP portion of its network as required by 47 CFR § 64.6304(a). The IP portion of its network transports originating interstate and intrastate non-8YY toll calls for customers that utilize the company's long distance service, Wabash LD (a registered trade name of Wabash Mutual Telephone Company). All other originating and terminating calls that route via the Frontier North Inc. ("Frontier") access tandem or the Brightspeed access tandems are transported over TDM trunks that are required by Frontier and Brightspeed and are not compatible with current SHAKEN technology. Wabash is prepared to rapidly implement STIR/SHAKEN for these calls as soon as Frontier and Brightspeed convert from TDM to SIP trunks at their tandem switches. Wabash is not aware of any plans that Frontier and Brightspeed have for such a conversion and has no control over when or if SIP conversions will take place by either carrier.

5. Section 64.6304(d) Extension of Implementation Deadline for Non-IP Networks.

Wabash claims the continuing exemption for the non-IP portion of its network pursuant to 47 CFR § 64.6304(d), "Those portions of a voice service provider's network that rely on technology that cannot initiate, maintain, and terminate SIP calls are deemed subject to a continuing extension. A voice service provider subject to the foregoing extension shall comply with the requirements of 47 CFR 64.6303 as to the portion of its network subject to the extension".

In compliance with Section 64.6303, Wabash has been and continues to work closely with Com Net Inc., TransNexus, and Metaswitch for the implementation of STIR/SHAKEN in both its IP and non-IP networks. Microsoft Corporation (parent company of Metaswitch) is a member of the Alliance for Telecommunication Industry Solutions ("ATIS") and is actively involved in the development of a non-Internet Protocol caller identification solution. TransNexus, although not a member of ATIS, is collaborating closely with them in developing non-IP solutions. Wabash is also a participant in the National Exchange Carrier Association ("NECA"), which is a member of ATIS and involved in non-Internet Protocol solutions. Wabash is prepared to conduct testing as needed on any non-IP solutions. Although Wabash's network is capable of being 100% IP, it is constrained by requirements of Frontier and Brightspeed to utilize TDM technology for connection to their tandem switches.

6. Certification Call Origination Procedures

Wabash certifies that all IP originating calls are subject to STIR/SHAKEN protocols, and all non-IP originating calls are subject to monitoring by TransNexus. See section 11 for details.

7. Participation in Traceback.

Wabash certifies that it will respond fully, within 24 hours, to all traceback requests from the Federal Communications Commission ("FCC"), law enforcement and the Industry Traceback Group ("ITG") and will fully cooperate with such entities in investigating and stopping illegal robocallers that use its service to originate, carry, or process illegal robocalls. A single point of contact has been established to respond to any requests.

Mike Boley
President and CEO
6670 Wabash Rd.
Celina, OH 45822
419-942-1111

Wabash follows the *ITG Policies and Procedures* document, including the *Provider Traceback Best Practices* contained in Appendix A. (This document is available at: <https://tracebacks.org/itg-policies-and-procedures/>).

8. Eligibility to Participate in the Robocall Mitigation Database.

Wabash certifies that it has not been barred or prohibited from filing in the Robocall Mitigation Database pursuant to a law enforcement action. It further certifies that the company has not at any time in the prior two years, 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 the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

9. Measures to Prevent New and Renewing Customers from Originating Illegal Robocalls: Subscriber Vetting (Know Your Customer, Customer Identification and Due Diligence).

Wabash utilizes the three key components of Know Your Customer (“KYC”) plans required in the financial services industry: Customer Identification, Customer Due Diligence, and Ongoing Monitoring. One benefit of being a small company is that Wabash employees know all their business customers, their lines of business and normal calling patterns. The employees know most residence customers by name. In addition, the company utilizes *Best Practices for the Implementation of Call Authentication Frameworks* published by the NANC Call Authentication Trust Anchor Working Group. (This document is available at: <https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf> and FCC Public Notice DA 20-1526, released December 22, 2020).

Vetting of subscribers, particularly business subscribers that purchase service capable of supporting high call volumes, involves obtaining information such as:

- Legal business name and trade names
- Federal tax ID
- State of Incorporation (only for foreign corporations)
- Nature of the business
- Primary contact person
- Service addresses
- Any authorized telephone numbers that are not provided by Wabash

If the business were a wholesale customer of Wabash, additional information would be required such as:

- OCN(s) and proposed use of wholesale services
- FCC Form 499-A Filer ID Number
- FCC Form 499-A filing status
- Robocall Mitigation Plan content and filing status

Vetting of residential and small business customers involves obtaining information such as service address, billing address, primary location, and responsible party as part of normal business practices.

New and renewing customers will be subject to service agreements and acceptable use policies that are designed to mitigate illegal robocalls. Failure to comply with the agreements and policies regarding illegal robocalls may result in service being discontinued.

10. Telephone Number Validation (KYC – Monitoring).

Wabash manages all telephone numbers that are assigned to it, including any ported-in numbers. Part of managing this inventory includes the identification of active numbers that are assigned to specific customers. This forms the basis for Telephone Number Validation for outgoing calls. The central office switch uses the assigned number information to prevent calls using a telephone number (ANI) that is not assigned to the customer originating the call. This prevents the use of unassigned numbers or numbers assigned to another customer. If the customer has legitimate rights to utilize a telephone number that was not assigned by Wabash, such as an 8YY number that belongs to the customer's corporate office, proof is required before that specific ANI will be permitted to originate calls. The switch also has the capability to provide statistical reports on originating voice traffic to assist in detecting traffic patterns associated with illegal robocalling.

11. Third-Party Validation and Real-Time Network Monitoring (KYC – Monitoring).

Wabash utilizes the ClearIP monitoring system from TransNexus that captures call details and provides call analytics, responses, and reports in real-time to process calls on its IP Network. Non-IP calls are also processed by the ClearIP system during call setup and the originating ANI is checked against several databases to determine if the number is invalid, on a DNO list (Do Not Originate), known robocall number list, etc. This initial screening augments the process described in the Telephone Number Validation section.

The use of call analytics, alerts and reports allows Wabash to immediately contact the customer to discuss unusual calling, determine if illegal robocalls are involved and provide necessary warnings or terminate the service. The system also produces real-time reports that provide details of all outbound network calling, including date, time, ANI, call volume, duration and other details that will assist in identifying calling patterns and detecting deviations from normal patterns.

12. Know Your Upstream Providers.

Wabash is a small rural provider of voice service, and the number of upstream providers is limited. Wabash has longstanding relationships with its upstream providers and maintains an awareness of their nature of business and the legitimacy of their call transmission services. The Robocall Mitigation Database is monitored to ensure that all upstream providers have current mitigation plans and that none have been suspended or revoked by the FCC. Upstream provider Mitigation Plans are reviewed for the details of their actions to mitigate illegal robocalls. Future contractual agreements with upstream providers will include provisions designed to mitigate illegal robocalls. Wabash will not accept direct traffic from any voice service provider or gateway provider that is not listed in the Robocall Mitigation Database.

13. Accepting Calls from Non-Gateway Intermediate Providers.

Pursuant to the *Sixth Caller ID Authentication Report and Order*, Wabash will not accept any traffic directly from a non-gateway intermediate provider not listed in the Robocall Mitigation Database, effective May 28, 2024.

14. International Services.

Wabash does not sell any services to international call originators using NANP number resources.

15. Ongoing Robocall Mitigation.

Wabash will implement a call authentication protocol for voice calls delivered over the non-IP portions of its network when such a protocol is fully developed and finalized by industry standards and the necessary equipment and software is available on the commercial market. Currently, Wabash plans to utilize the TransNexus alternate solution for non-IP traffic if it is compliant with or accepted as the final, industry-wide standard to provide robocall mitigation on any TDM trunk groups until they are converted to IP. This will provide for ongoing robocall mitigation that covers both the IP and non-IP portions of its network.

16. Mitigation Plan Revisions.

Wabash is committed to update this plan as conditions change and the availability of additional robocall mitigation systems, particularly for TDM traffic, gain industry-wide acceptance. The Robocall Mitigation Database will be updated within ten (10) business days of any substantial changes to the current plan.

17. Officers and Directors – Wabash Mutual Telephone Company (FRN 0004333266)

Alan Post, Chairman
Karl Schoenherr, Vice Chairman
Chuck Alig, Director
Tim Berkenstock, Director
Bill Gaerke, Director
Jackie Muhlenkamp, Secretary
Mike Boley, President, CEO and Treasurer

Shareholders with 10% or greater ownership

None

Affiliates

None

Subsidiaries

Wabash Communications, Inc. (FRN 0004965380)
Officers and Directors
Same as Wabash Mutual Telephone Company (shown above)

Parent Company

None

Trade Names

Wabash LD

Previous Business Names

None