



February 23, 2024

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FCC Wireline Competition Bureau

45 L Street N.E.

Washington DC 20554

RE: Colton Telephone Company Robocall Mitigation Plan

Colton Telephone dba Coltontel has taken the following steps to mitigate and avoid illegal robocall traffic originating from their voice services.

Colton Telephone does not sell services to international call originators.

Colton Telephone does not sell their services to subscribers outside of their physical exchange boundaries.

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

Colton Telephone 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.

Colton Telephone Contract / Terms of Service allow Colton Telephone to terminate for abuse of service.

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

Colton Telephone 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.

Colton Telephone digital certificate is registered with iConnectiv STI- PA

Colton Telephone implemented STIR/SHAKEN in 2023.

Colton Telephone 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.