



HCTC ROBOCALL MITIGATION PLAN

This Robocall Mitigation Plan describes the specific reasonable steps that Hill Country Telephone Cooperative, Inc., (HCTC) had taken to avoid the origination, carrying, or processing of illegal robocall traffic on its network.

Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Robocalls

HCTC has a “know-your-customer” policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. HCTC thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new services or making changes to existing services.

Although HCTC’s customers generally do not generate a high volume of calls, if HCTC were to receive a request for high-volume origination services, it would exercise caution and extensively investigate such customers before granting access to the services.

If it is determined that an HCTC customer is originating unlawful robocalls on our network, HCTC will either warn the customer to stop or terminate their service as allowed per HCTC’s policies that define the circumstances by which HCTC will suspend or terminate service to a customer.

“Know-Your-Upstream Provider” Procedures

Most of the connections that HCTC has with upstream providers have been in place for many years, and we know these companies very well. However, HCTC exercises due diligence before accepting traffic from any new upstream provider as we seek to ensure that such providers are not using HCTC to carry or process a high volume of illegal traffic. Specifically, HCTC collects information such as the upstream provider’s physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of their business.

Use of Call Analytics Systems

HCTC uses Ribbon Call Trust to provide robocall analytics and reputation scoring of our network’s outbound traffic. Ribbon Call Trust’s analytics identify patterns of suspected illegal robocalls and scores the calls based on their behavior and/or their status as suspected robocalls as reported to the Federal Communications Commission, Federal Trade Commission, and as reported by other carriers. HCTC has access to the Ribbon Call Trust portal and receives daily notifications about phone numbers originating suspected illegal robocalls on its network, including from unassigned, inactive, and Do-Not-Originate numbers. HCTC also receives reports via email alerts if any of its phone



numbers experience a change in reputation such as suspicious traffic patterns or other detected anomalies outside the normal behavior of our company's traffic. HCTC will examine the reports and investigate and identify the source of the calls as unlawful or legitimate.

Commitment to Respond to Traceback Requests

HCTC commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its services to originate, carry, or process, illegal robocalls.