

BLEDSON TELEPHONE COOPERATIVE, INC. ROBOCALL MITIGATION PLAN

Bledsoe Telephone Cooperative, Inc. (Operating Company Number 0554) is a small/rural carrier eligible for the continuing extension of the STIR SHAKEN implementation deadline as a small voice service providers (§ 64.6304 (a)(2) that has non-IP portions within its network § 64.6304(d).

Bledsoe Telephone Cooperative, Inc. provides voice service to fewer than 100,000 voice subscribers lines and has customers served on the non-IP portions of Bledsoe Telephone Cooperative's network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls. Bledsoe Telephone Cooperative also has IP within its network. Bledsoe Telephone Cooperative has registered with the STI-PA and is using its certificate to sign originating IP calls.

To meet the non-IP network criteria for the continuing STIR SHAKEN extension (§ 64.6303 (a)(2)), Bledsoe Telephone Company is a member of NTCA. NTCA participates on the ATIS PTSC Non-IP Call Authentication Task Force working group which developed the non-IP call authentication solutions (ATIS Solutions). NTCA is serving as Bledsoe Telephone Company's third-party representative on the ATIS PTSC Non-IP Call Authentication Task Force working group.

Bledsoe Telephone Cooperative, Inc. has implemented the following Robocall Mitigation Plan to detect and prevent unlawful robocalls from originating on its network.

All calls that originate on Bledsoe Telephone Cooperative's network are subject to the described robocall mitigation program.

Robocall Mitigation Program

Robocall Mitigation Plan

Bledsoe Telephone Cooperative, Inc. uses Ribbon Call Trust, to provide robocall analytics and reputation scoring of our network's outbound traffic. Bledsoe Telephone Cooperative, Inc. receives reports if any of its numbers experience a change in reputation such as suspicious traffic patterns or other detected anomalies outside the normal behaviour of our company's traffic. Bledsoe Telephone Cooperative, Inc. examines the reports to investigate and identify the source of the calls as unlawful or legitimate.

Bledsoe Telephone Cooperative, Inc. has contracted with Innovative Systems to implement Terminating Call Management. This service challenges all out of area calls and any calls originating out of our service area with local prefixes. Bledsoe also purchased individual licenses for all existing customers to be able to manage their calls

with blocked and allowed lists. The service provides reports on the blocked and allowed calls.

Enforcement

If it is determined a Bledsoe Telephone Cooperative, Inc. customer is originating prohibited unlawful robocalls on our network, Bledsoe Telephone Cooperative, Inc. will either warn the customer to stop or terminate their service as allowed per Bledsoe Telephone Cooperative, Inc. policy.

Upstream Provider Knowledge

Bledsoe Telephone Cooperative, Inc. knows all the carriers from which it receives traffic and has confirmed that all its connected carriers are listed in the Robocall Mitigation Database.

Bledsoe Telephone Cooperative, Inc. has also reviewed the connected carrier's RMPs to learn how the carriers monitor their originating traffic to mitigate illegal robocalls.

Bledsoe Telephone Cooperative, Inc. is now incorporating traceback and prohibited traffic language in all contractual agreements with upstream carriers.

Traceback

Bledsoe Telephone Cooperative, Inc. 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 illegal robocallers that use its service to originate, carry, or process illegal robocalls.

Know Your Customer

Bledsoe Telephone Cooperative, Inc. has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Bledsoe Telephone Cooperative, Inc. thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services.

Customer Education

Bledsoe Telephone Cooperative, Inc. posts information on its website to educate customers on how to protect themselves from becoming a victim of unlawful robocalls and a process to report complaints related to robocall activity. We also provide information via Facebook and bill inserts occasionally.