

HOME TELEPHONE ILEC LLC ROBOCALL MITIGATION PLAN

Home Telephone, OCN 0527, is eligible for the continuing extension of the STIR SHAKEN implementation deadline on Non-IP networks as a small voice service provider (§64.6304 (a)(2) that has non-IP portions within its network §64.6304(d).

Home provides local service to fewer than 100,000 voice subscriber lines. The majority of customers are served on the non-IP portions of Home's network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

Consistent with § 64.6303 (a)(1), Home is ready to upgrade its entire network to allow for the initiation, maintenance, and termination of SIP calls and fully implement the STIR/SHAKEN framework. Home's non-IP network is connected to carriers that do not support IP connectivity, therefore, Home cannot upgrade its Non-IP network to IP.

Home has implemented the following Robocall Mitigation Plan to detect and prevent unlawful robocalls from originating on its network.

Home has contracted with TNS (Call Guardian Solution) to provide robocall analytics and reputation scoring of our network's outbound traffic. The vendor'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 (FCC), Federal Trade Commission (FTC), and as reported by other carriers. Home has access to the vendor's portal and receives notifications about telephone numbers originating suspected illegal robocalls on its network, including from unassigned, inactive and do-not-originate TNs. Home will examine the reports and investigate and identify the source of the calls as unlawful or legitimate.

Know your Customer

Home has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Home 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.

Upstream Provider Knowledge

Home knows all the carriers from which it receives traffic and has confirmed that all of the carriers are listed in the Robocall Mitigation Database. Home monitors incoming traffic from all connected carriers for suspicious call patterns indicative of illegal robocall activity, notifies the upstream carriers of any such traffic and warns the carriers that if the traffic does not cease, the calls may be blocked from entering Home's network. In addition, Home is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.

Enforcement

If it is determined a Home customer is originating prohibited unlawful robocalls on our network, Home will either warn the customer to stop the behavior or terminate their service as allowed per

Home's policies that define the circumstances by which Home will suspend or terminate service to a customer.

Traceback

Home is committed to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to originate calls. Home commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within twenty-four (24) hours.

Ownership

The Principals of Home Telephone ILEC, LLC dba Home Telecom are: Will Helmly is the President and serves as Chief Executive Officer of Home Telephone ILEC, Anthony Douglas is Chief Operating Officer, Robert Meeker is Chief Financial Officer and Robert Edwards is Chief Growth and Experience Officer.

Will Helmly has Managing Control of Home Telephone ILEC, LLC dba Home Telecom and all its affiliates and subsidiaries. The parent company of Home Telephone ILEC, LLC dba Home Telecom is Home Telephone Company, Inc..

Home Telephone Company, Inc. has 100% percentage ownership of Home Telephone ILEC, LLC and its affiliate Berkeley Cable Television, Inc..