

Robocall Mitigation Compliance with TRACED Act

Date	Contact/Title	Change Summary
February 9, 2026	David Thacker, Technical Operations Manager	

This response is submitted on behalf of Thacker-Grigsby Telephone Company inc., an incumbent local exchange carrier, and its wholly owned subsidiary, T.V. Service inc., a provider of competitive local exchange services. Each company serves rural communities in the state of Kentucky and share switching operations, including their respective Robocall Mitigation Plans, and will be referred to as “Thacker-Grigsby” throughout this document.

I. Implementation and Extension Status

Extensions Received Under 47 C.F.R. §64.6304

Thacker-Grigsby is eligible for the continuing extension of the STIR SHAKEN implementation deadline as a small voice service provider (§64.6304 (a)(2) that has non-IP portions within its network §64.6304(d).

Participation in Industry Efforts

Thacker-Grigsby is a member of NTCA who participates on the ATIS Non-IP taskforce working group which developed the (ATIS Solutions) non-IP call authentication solutions and serves as Thacker-Grigsby’s third-party representative on the ATIS Non-IP taskforce working group.

Status of STIR/SHAKEN Implementation

Thacker-Grigsby subscribes to Ribbon’s Identity Hub Service which provides the company access to a complete STIR/SHAKEN solution. Thacker-Grigsby uses Ribbon’s service for the Secure Telephone Identity – Authentication Service and the Secure Telephone Identity – Verification Service functions. Thacker-Grigsby has its own STIR/SHAKEN certificate which is issued by Iconectiv.

II. Robocall Mitigation Plan

Thacker-Grigsby is a voice service provider and all calls that originate on its network are subject to the company’s robocall mitigation plan. Thacker-Grigsby uses Call Analytics and Know Your Customer to prevent the origination of robocall traffic on its network. All carriers to which Thacker-Grigsby are connected appear on the Robocall Mitigation Database and their traffic is subject to the same mitigation plan as that of its own end users.

Analytics

Thacker-Grigsby has deployed the Ribbon Identity Hub Service that provides detailed live analysis and reporting on outbound traffic to identify potential illegal robocalling by detecting and flagging for review, suspicious calling patterns. The program includes a reputation monitoring feature that allows

Thacker-Grigsby to monitor specific numbers for changes in utilization patterns that may indicate illegal robocalling.

Know Your Customer

Thacker-Grigsby also utilizes the mitigation technique of “Know Your Customer.” Thacker-Grigsby is a small, long-established provider that maintains a close relationship with its subscribers. Its customers are generally “mom and pop” users and few of its total customer base have enough call paths to generate the high volume of traffic associated with robocalling allowing us to use targeted in-house analytics to monitor, alert and apprehend suspected robocalling activities.

Thacker-Grigsby has set a call path level based on its average customer size. The level – referred to as “large volume calling capability” – is subject to change.

Thacker-Grigsby has a screening process for new customers requesting service at or above large volume calling capability levels:

- We will not deploy large volume calling capability as a residential service or at an address shown in the company records as being residential
- Business requesting large volume calling capability must provide a tax ID and verification as to the nature of the business
- We verify addresses to look for overlapping / multiple deployed voice path subscriptions
- A Thacker-Grigsby representative may visit the premise of the business to verify the number of users at the location is appropriate for the volume of calling

III. Traceback and Enforcement Cooperation

Thacker-Grigsby will actively participate with the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG). Thacker-Grigsby commits to respond within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium and will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

IV. Additional Certifications

Neither Thacker-Grigsby nor any entity which shares common ownership, management, directors, or control has 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.