

TOTAH COMMUNICATIONS, INC. ROBOCALL MITIGATION PLAN

Total Communications, Inc. 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). Total Communications, Inc. has voice subscriber lines in the states of Kansas and Oklahoma.

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

Consistent with § 64.6303 (a)(1), Total Communications, Inc. 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. Total Communications, Inc.'s non-IP network is connected to carriers that do not support IP connectivity, therefore, Total Communications, Inc. cannot upgrade its Non-IP network to IP.

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

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

All calls that originate on Total Communications, Inc's network are subject to the described robocall mitigation program.

Robocall Mitigation Plan

Total Communications, Inc. has contracted with a vendor, Ribbon Communications Operating Company, Inc. to provide robocall analytics and reputation scoring of our network's outbound traffic. Total is using Ribbon Call Trust as the service to accomplish this task. Specifically, Total is using Call Controllers using SIP to Reputation Scoring Service.

Total Communications, Inc. uses the Terminating Call Manager or TCM from Innovation Systems to challenge or prompt out of area calls to press "1" to screen our unwanted telemarketers. The service will learn what numbers are being allowed and not challenged them again.

These analytics: 1. Place a rule at the top of the Routing Table to send a SIP invite to the Ribbon Reputation Scoring Service. 2. Reputation Scoring determines the likelihood that a call should be blocked. A call should be blocked because (a) The originating Telephone Number shows up a DO-NOT-Originate list or is an unallocated, unused, or invalid

number. (b) Reasonable analytics indicated the call is highly likely to be illegitimate and malicious in intent. 3. When Reputation Scoring determines a call should be blocked it will respond with a SIP608 Rejected message, or if determined to be necessary, a SIP 607 or 603 message can be returned. In turn, the originating C15 call controller will send this call to treatment to be blocked. 4. If Reputation Scoring determines the call is not likely to be illegitimate, it will respond with a SIP 503 Service Unavailable message, or if determined to be necessary, a SIP 480 message can be returned. In turn, the originating C15 call controller will route advance to the proper outgoing trunk. 5. If Reputation Scoring encounters a service error condition, it will return SIP 500 Internal Server Error message, or if determined to be necessary, a SIP 480 or SIP 503 message can be returned. In turn, the originating C15 call controller will route advance to proper outgoing trunk continuing the call normally.

As described above, these 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. Totah Communications, Inc. 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. Totah Communications, Inc. also receive reports via e-mail alerts 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. Totah Communications, Inc. will examine the reports and investigate and identify the source of the calls as unlawful or legitimate.

Enforcement

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

Traceback

Totah Communications, Inc. 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. Totah Communications, Inc. commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within twenty-four (24) hours.

Know Your Customer

Totah Communications, Inc. has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Totah Communications, Inc. thoroughly vets new residential and business customers by asking for a photo ID, (driver's license) and personally identifiable questions for additional security on each account before activating new service or making changes to existing services.

Know Your Upstream Providers

Totah Communications, Inc. knows all the carriers from which it receives traffic and has confirmed that all of the carriers are listed in the Robocall Mitigation Database. Totah Communications, Inc. monitors incoming traffic from all connected carriers for suspicious call patterns indicative of illegal robocall activity. The connected carriers are made aware of any suspicious or illegal traffic identified and are notified that, if the traffic does not cease, the calls may be blocked from entering Totah Communications, Inc.'s network. No provider is using Totah Communications, Inc.'s network to carry or process a high volume of illegal traffic. In addition, Totah Communications, Inc. is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.