



Amherst Telephone Company, d/b/a Amherst Communications (hereafter referred to as Amherst Communications) is a small/rural carrier with headquarters at 120 Mill St., Amherst, WI 54406.

Amherst Communications is a voice service provider with a STIR/SHAKEN implementation obligation to service end-users. Since IXCs have not ordered IP trunking into the access tandem, a portion of our traffic is lacking the necessary facilities to implement STIR/SHAKEN. We therefore qualify for an additional extension under 47 C.F.R. Section 64.6304(d).

Amherst Communications is not a foreign voice provider.

Amherst Communications has not 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.

Amherst Communications has not been prohibited from filing in the Robocall Mitigation Database pursuant to a law enforcement action.

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

Robocall Mitigation Program

We use call analytics software provided by TransNexus to monitor all outbound voice traffic in real-time to prevent the origination or transit of illegal robocalls.

The software provides detailed reporting to identify suspected illegal robocalls. The system alerts us if we process outbound calls where the calling number has a poor reputation or is invalid, unallocated, or on a Do Not Originate list.

We perform the same mitigation steps for all outbound calls regardless of our role in the call chain for a particular call.

We immediately investigate any identified suspicious calls to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls. If we determine

that the traffic was likely unlawful, then we warn them to stop sending such traffic. If they continue to send traffic that appears to be unlawful, then we terminate their service.

STIR/SHAKEN

We have registered with the STI-PA using OCNs 0843 and 279H. We have our own STIR/SHAKEN certificate issued by TransNexus STI-CA. We have implemented STIR/SHAKEN using an STI-AS and STI-VS supplied by TransNexus.

Traceback

We are 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. Amherst Communications commits to respond to all traceback requests within 24 hours.

Customer Vetting

We follow the caller ID authentication best practices for vetting caller identity and operational legitimacy for new and existing customers as described by the NANC Call Authentication Trust Anchor Working Group.

This process includes the collection and review of entity-identifying information to confirm that we have an authenticated relationship with the customer. We use this authenticated information to determine whether the customer is subject to any enforcement actions that restrict the type of calling that they may do, for example, if they have been banned from initiating telemarketing calls.

We also validate, when possible, that the entity has a legitimate right to use its asserted calling numbers. We use this information to support the attestation level we assign to calls that we originate for that customer.

Our contractual provisions with customers prohibit them from initiating illegal robocalls. If we find a customer initiating suspicious robocalls, we warn them to stop. If such traffic continues, then we terminate their service.

Provider Vetting

We have a vetting and review process for upstream providers, that is, providers that send us voice traffic that we terminate or transit to other providers.

We confirm that the upstream provider has a certification in the Robocall Mitigation Database. We will not accept voice traffic from an unregistered provider.

We require that the upstream provider has a reasonable robocall mitigation plan, including a vetting process for its customers and upstream providers, and uses call analytics to identify suspicious traffic.

We establish an understanding of the upstream provider's role in the call path for the traffic they will send to us, for example, whether they are acting as an originating voice service provider, a foreign intermediate provider, or a U.S.-based intermediate provider. We use this information to understand whether we will be obligated to authenticate unsigned traffic that we receive from them.

Our contractual provisions with upstream providers prohibit them from sending us illegal robocalls. If we find that an upstream provider is sending us suspicious robocalls, we warn them to stop. If such traffic continues, then we terminate their service.

Enforcement

If it is determined our customer is originating prohibited unlawful robocalls on our network, we will either warn the customer to stop or terminate their service as allowed per Amherst Communications' policies that define the circumstances by which we will suspend or terminate service to a customer. Amherst Communications publishes these policies on its website (<https://amherstcomm.net/phone-terms>).

Customer Education

Amherst Communications occasionally posts information on its website (<https://amherstcomm.net/robocalls>) or Facebook page (<https://amherstcomm.net/facebook>) to educate customers on how to protect themselves from becoming a victim of unlawful robocallers and a process to report complaints related to robocall activity. In addition, Amherst Communications' website directly links to the FCC Consumer Help Center for further assistance and direction in dealing with phone scams, robocalls, and other concerns.