



MILLRY TELEPHONE COMPANY, INC.

## **Millry Telephone Company, Inc. Robocall Mitigation Program**

This Robocall Mitigation Plan describes the specific reasonable steps that Millry Telephone Company, Inc. (“MTC”), has taken to avoid the origination, carrying, or processing of illegal robocall traffic in its network.

### **Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Robocalls**

MTC has a “know-your-customer” policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. MTC verifies the identity of all new and renewing customers, including confirming their service address. We also verify customers’ credit history.

MTC’s business customers are small businesses that are physically located in our service territory. Prior to a new business customer ever making a call, we personally know, or get to know, the business owners and/or management and their business reputation. This personal touch gives MTC a clear view of whether the business is a risk for originating illegal robocalls.

MTC has never received a request for high-volume origination services. However, were MTC to ever receive such a request, we would exercise caution and investigate the requesting entity extensively prior to granting access to the service. In particular, we would collect information such as their physical business location, contact person(s), state or country of incorporation, federal tax ID, and the general nature of their business.

MTC’s customers can originate calls only from a number that identifies in the company’s switches as a number that has been assigned to them. This prevents customers from originating calls with a spoofed caller ID number, which greatly mitigates the likelihood of illegal robocalls originating on MTC’s network.

MTC’s standard current customer service agreement states that customers are expected to use their services only for legal purposes. In addition, MTC’s policies define the circumstances by which it will deny, suspend, or terminate service to a customer, including if a user breaches the customer service agreement. MTC would not hesitate to suspend or terminate service to a customer that it discovered was using, or attempting to use, MTC’s network to originate illegal calls.

### **“Know-Your-Upstream Provider” Procedures**

Currently, the only upstream providers from which MTC receives traffic are AT&T and TDS. MTC’s connections with these providers have been in place for many years, and we know them very well. MTC has reviewed AT&T’s and TDS’s robocall mitigation plans to learn how they monitor their originating traffic to mitigate illegal robocalls.

Before accepting traffic from any new upstream provider, MTC would exercise due diligence and seek to ensure that the provider is not using MTC to carry or process a high volume of illegal traffic. Specifically, MTC would collect information such as the upstream provider’s physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of their business.

In addition, MTC incorporates traceback and prohibited traffic language in all contractual agreements with upstream providers.

### **Use of Call Analytics Systems**

MTC does not presently use any call analytics systems to identify and block illegal robocall traffic.

### **Commitment to Respond to Traceback Requests**

MTC 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 any illegal robocallers that use its services to originate, carry, or process illegal robocalls.