

Woodstock Telephone Company Robocall Mitigation Program

This Robocall Mitigation Plan describes the specific reasonable steps that Woodstock Telephone Company (“Woodstock”) has taken to avoid the origination, carrying, or processing of illegal robocall traffic. Woodstock’s voice service is provided via a VoIP platform hosted by Sinch. Sinch performs all switching operations for Woodstock’s voice service. Therefore, Woodstock does not have control over the network infrastructure necessary to implement STIR/SHAKEN.

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

Woodstock has a “know-your-customer” policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. Woodstock’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. This personal touch gives Woodstock a clear view of whether the business is a risk for originating illegal robocalls.

Woodstock has never received a request for high-volume origination services. However, were Woodstock to ever receive such a request, we would exercise caution and extensively investigate the requesting entity prior to providing 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.

Woodstock does not permit its voice customers to make calls using any phone number other than a number assigned to them. In addition, Sinch checks the origination number in real time against available databases of known illegal robocalling numbers, a Do Not Originate database, and internal databases of known problem numbers, before sending the call to the next carrier in the call chain. These measures greatly mitigate the likelihood of illegal robocalls being originated by Woodstock’s customers.

Woodstock’s Terms and Conditions for its hosted services, posted on its website, states that these services cannot be used for any illegal, fraudulent, improper, or abusive purpose, including creating a false caller identity (ID spoofing). Woodstock, at its sole discretion, may suspend or terminate a customer’s services for any such improper use. Woodstock would not hesitate to enforce this policy if it was notified by Sinch that a customer was attempting to use its services to originate illegal traffic.

“Know-Your-Upstream Provider” Procedures

Woodstock relies upon the “know-your-upstream provider” procedures of Sinch, whose hosted VoIP platform Woodstock uses to offer voice service. Woodstock is confident that Sinch exercises due diligence before accepting traffic from an upstream provider.

Use of Call Analytics Systems

Woodstock’s hosted VoIP service utilizes call analytics employed by Sinch to identify and potentially block illegal robocalls.

Commitment to Respond to Traceback Requests

Woodstock 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 illegal robocallers that use its service to originate, carry, or process illegal robocalls.

A handwritten signature in black ink that reads "Terry Nelson". The script is fluid and cursive, with the first letters of "Terry" and "Nelson" being capitalized and prominent.

Terry Nelson

General Manager

Woodstock Communications