

**City of Highland dba Highland Communication Services (“Company”)
Robocall Mitigation Plan
FRN 0020389763**

We have chosen to employ a multi-layered approach to address and mitigate illegal robocalling, and to participate in industry call trace back efforts. Company efforts will include the following:

- Incorporation of robocall mitigation language into our contracts, terms of service, acceptable use policy, tariffs and/or other documents as appropriate prohibiting use of our platforms to make or receive illegal calls.
- Specifically, with respect to caller-ID, to require that the caller-ID value be either a number assigned to the calling party, or one which the caller has the explicit permission of the assignee to use.
- When non-compliant calls come to our attention, through our own analysis or via Momentum (hereafter referred to as "3rd Party switch vendor and voice services provider"), we shall promptly investigate and take necessary action with the offending customer to mitigate ongoing illegal activity.
- Company shall provide a point-of-contact for traceback and takedown requests from bona fide sources, and respond within twenty-four (24) hours. For credible requests that include sufficient supporting detail, we will not require a subpoena or similar documentation.
- Company shall share as much information with industry forensics efforts and enforcement officials as is practical and legal, recognizing that users of our platform that are breaking the law need not be afforded the same privacy protections as those complying with the rules.
- Company shall exercise its due diligence by requiring our service provider partners, including upstream provider partners, to implement these same practices and impose this same requirement on their partners, or face restrictions on their use of our platform, including, if necessary, complete termination of access.
- Company abuse mitigation practices shall be applied in a non-discriminatory manner.
- If we discover that traffic originally flagged as illegal is in fact legitimate, we will share that information with other parties in the call chain.
- Company shall vet each customer thoroughly, with additional scrutiny on customers involved with auto-dialed traffic types. Anonymous test accounts will not be provided

- Company will employ real-time controls on traffic. All calls must have valid caller-ID values, and for auto-dialed calls, each value must be checked against the list of numbers that customer provided and that Company staff vetted before establishing service. Each customer must have a calls-per-second limit commensurate with the traffic description provided.
- Company shall monitor the traffic moving through its network. CDRs shall be analyzed regularly by our 3rd party switch vendor, voice service provider and internal technicians. Inspection of call durations to ensure that no auto-dialer traffic is being sent by customers that signed up for voice service. Company shall track call volumes and caller-ID utilization to spot changes indicative of illegal robocalls. Verify most-frequent Caller-IDs to identify any that are being misused.
- We shall require our 3rd party switch vendor, voice services provider and internal technicians to check the Certificate Revocation List (CRL) as part of their routine compliance activities.
- Company has identified a single point of contact in charge of responding to traceback requests, and respond to traceback requests as soon as possible as well as work with, communicate and cooperate with state Attorneys General about recognized scams and trends in illegal robocalling. Update the state Attorneys General about potential additional solutions for combatting illegal robocalls. Also see bullet #4.
- For voice residential customers Company makes available free, easy-to-use call blocking and labeling tools and regularly engage in easily understandable outreach efforts to notify customers about these tools. For all types of customers, Company implements network-level call blocking at no charge. We use best efforts to ensure that all tools offered safeguard customers' personal, proprietary, and location information.
- Company uses best efforts to confirm the identity of new commercial voice customers by collecting information such as physical business location, contact person(s), state or country of incorporation, federal tax ID, and understanding the nature of the customer's business including if/how they will employ auto-dialers or other robocall style tools in the conduct of their business.
- We monitor, through our 3rd party Regulatory Compliance Consultant, the efforts of the Federal Trade Commission and the Federal Communication Commission in regards to their robocall mitigation efforts, identification of industry trends, provision of consumer education materials, and other related information and alerts.