

Robocall Mitigation Plan

McDonough Telephone Cooperative, OCN 1047, is a voice service provider with a STIR/SHAKEN implementation obligation serving end users. As such, McDonough Telephone Cooperative has fully implemented STIR/SHAKEN for all IP-Enabled voice traffic that originates on our network using TransNexus as our Authentication Service.

At McDonough Telephone Cooperative we take our duty to help protect consumers from robocalls seriously. As a result, we have the following safeguards in place.

Principals, Affiliates, Subsidiaries, and Parent Companies

McDonough Telephone Cooperative is a member-owned ILEC operating in Illinois serving 12 telephone exchanges. MTC Communications, Inc. is a wholly owned subsidiary of McDonough Telephone Cooperative providing telecommunication and non-telecommunication services in non-ILEC areas. Jay Griswold is the CEO of McDonough Telephone Cooperative and of its subsidiaries. Holly Fecht is the CFO of McDonough Telephone Cooperative and of its subsidiaries.

Know Your Customer

While we do not include contractual provisions in our agreement, we follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>). We use Know Your Customer with call analytics described below:

Call Analytics

Daily analytics reports are provided by Cordell Network Solutions. We use these daily reports to monitor excessive call quantity and review to make sure that they are associated with one of our customers. If we see an excessive quantity of calls from a customer that has not typically exceeded the threshold we reach out to verify that the calls are legitimate.

Know-Your-Upstream-Provider

We maintain on file the physical business location, contact information and escalation lists, incorporation information, and the federal tax ID number for all upstream providers. Call analytics are performed and monitored and if an excessive quantity of calls appears we reach out to verify that the calls are legitimate.

Traceback

We respond to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls.

STIR/SHAKEN Extensions

McDonough Telephone Cooperative is subject to a continuing extension for Non-IP Networks pursuant to 47 CFR §64.6304(d). This exemption is claimed for portions of our network that rely on

technology that cannot initiate, maintain, carry, process, and terminate SIP calls and are therefore subject to a continuing extension.

All voice traffic that originates on our network is subject to the robocall mitigation program described below:

Robocall Mitigation Program

All IP-Enabled voice traffic that originates on our network is signed and authenticated using the TransNexus ClearIP platform to prevent the origination of robocalls. TransNexus provides detailed reporting identifying suspected illegal robocalls and alerts us if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC Consumer Complaint Database or has a poor reputation. We will immediately investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If we determine that the caller was attempting to originate unlawful robocalls, then we will either warn them to stop or terminate their service as appropriate.

In addition, we regularly educate our customers about the Do Not Call Registry and robocalls to help with awareness on the front end.

Certifications

- McDonough Telephone Cooperative has not been prohibited from filing in the Robocall Mitigation Database due to a law enforcement action.
- McDonough Telephone Cooperative has not, at any time in the prior two (2) years, 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 encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.