



La Jicarita Rural Telephone Company, Inc. Robocall Mitigation Plan

This Robocall Mitigation Plan describes the specific reasonable steps that La Jicarita Rural Telephone Company, Inc. (La Jicarita) has taken to avoid the origination, carrying, or processing of illegal robocall traffic on its network.

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

La Jicarita has a “know-your-customer” policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. La Jicarita vets the identity of all new residential and business customers.

Prior to a new business customer ever making a call on La Jicarita’s network, we personally know, or get to know, the business owners and/or management. This relationship building gives La Jicarita a clear view of whether or not the business presents a risk for originating illegal robocalls.

La Jicarita’s business customers are mostly small businesses that are physically located in our service territory. As a result, La Jicarita has never received a request for high-volume origination services. However, were La Jicarita 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.

“Know-Your-Upstream Provider” Procedures

La Jicarita has connections with only a few upstream providers. These connections have been in place for many years and we know these providers very well. Before accepting traffic from any new upstream provider, La Jicarita would exercise due diligence and seek to ensure that the provider is not planning to use La Jicarita to carry or process a high volume of illegal traffic. Specifically, La Jicarita 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. La Jicarita would also take additional steps, if necessary, such as adopting contract terms that allow for termination, and acting on those terms, in the event the upstream provider attempts to use La Jicarita’s network to carry or process a high volume of illegal traffic.

Use of Call Analytics Systems

La Jicarita uses *Transaction Network Services (TNS) Call Guardian* analytics technologies and services to monitor traffic on its network and identify potentially unlawful call origination activity. If La Jicarita has a reasonable basis to believe that a customer is originating illegal robocalls, it will require the customer to remedy the problem. If effective action is not taken, La Jicarita will suspend and/or terminate service to the customer.

In addition, La Jicarita has deployed call blocking services provided by TNS. La Jicarita blocks the following types of calls by default:

- Calls that purport to be from invalid, unallocated, or unused numbers.
- Calls from phone numbers on a Do-Not-Originate list.

Commitment to Respond to Traceback Requests

La Jicarita 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.