

Franklin Telephone Co., Inc.

PO Box 96, Franklin, VT 05457

ROBOCALL MITIGATION PLAN

February 14, 2026

Company Information

Franklin Telephone Co., Inc., P.O. Box 96, 5217 Main St, Franklin, VT 05457-0096.

Franklin's operating company number is 0053. We are the parent company. A subsidiary is FranklinVT, LLC for long distance services carried over the Franklin network.

Franklin Telephone Co., Inc. (Franklin) is an incumbent local exchange carrier and internet service provider in Vermont. Franklin is a small rural voice service provider with fewer than 1,000 subscribers utilizing both TDM and SIP services in its network.

Implementation and Extension Status

Franklin is eligible for the continuing extension of the STIR/SHAKEN implementation deadline as a small voice service provider (§64.6304 (a)(2) that has non-IP portions within its network §64.6304(d).

Status of STIR/SHAKEN Implementation

Franklin has implemented authentication and verification with STIR/SHAKEN voice traffic that is delivered as IP to its underlying interexchange partner through attestation services provided on a hosted basis by Inteliquent, a Sinch company and Neustar. The traffic that is TDM, from Consolidated Communications/Fidium, remains subject to its robocall mitigation plans.

Robocall Mitigation

Franklin is a voice service provider and all calls that originate on its network are subject to the company's robocall mitigation plan. Franklin uses Know Your Customer to prevent the origination of robocall traffic on its network. All carriers to which Franklin is connected appear on the Robocall Mitigation Database and their traffic is subject to the same mitigation plan as that of its own end users.

General Prohibition Against Illegal Robocalling

Franklin's customers are subject to terms and conditions that specifically prohibit activities normally associated with robocalling including, but not limited to:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable local, state, or federal law; using Franklin's network;
- service to engage in or in connection with fraudulent activities

Franklin has the right to suspend or terminate service for violation of the company's policies.

Franklin Telephone Co., Inc.

PO Box 96, Franklin, VT 05457

ROBOCALL MITIGATION PLAN

February 14, 2026

Risk Assessment

Franklin's customers generally do not originate high volume calls. Franklin's network configurations limit the number of total originating calls to less than 50 at one time. Franklin has not received information suggesting that robocalls are originated on its network. Franklin has minimal small business customers and no large business customers. Franklin does not consider its network at high risk of originating illegal robocalls.

Franklin's prior certification to the FCC is still in good standings and there is no prohibition from filing in the Robocall Mitigation Database.

Know your Customer

Franklin is a small rural residential town where we personally know our customers. There are procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Franklin's customers are provisioned with a maximum of 3 call paths per line, which is not enough to generate the high volume of call traffic associated with outbound robocalling.

number of originating calls to less than 50 at one time. There are alarm notifications in place if usage nears capacity. Service will be suspended with the possibility of termination for illegal Robocall activities.

Franklin does not provide voice origination services to third party carriers; all voice origination products are provided directly to end users.

At this time, Franklin does not have any business end users with large volume calling capability. If a business end user notifies Franklin that they will be performing a large volume of outbound calls they will be directly contacted to review Franklin's policies and efforts to prevent Franklin's network from being used for illegal robocalling.

Monitoring and Enforcement

Franklin monitors outbound voice traffic to identify patterns consistent with robocalls. If it is determined a customer is originating prohibited unlawful robocalls on our network, the customer will be instructed to stop or their service will be suspended or terminated allowed per Franklin's policy

Franklin monitors all outbound voice traffic in real-time to prevent the origination or transit of illegal robocalls. The system provides detailed reporting to identify unusual heavy traffic which may be suspected illegal robocalls. Franklin monitors outbound calls where the calling number has a poor reputation or is invalid, unallocated, or on a Do Not Originate list.

Franklin Telephone Co., Inc.

PO Box 96, Franklin, VT 05457

ROBOCALL MITIGATION PLAN

February 14, 2026

Call analytics are captured by our upstream carrier, Inteliquent as well as from our own network call statistics.

Franklin immediately investigates any identified suspicious calls to determine if the caller was attempting to originate or transit unlawful robocalls. If it is determined that the traffic was likely unlawful, then the originator is warned to stop sending such traffic. If they continue to send traffic that appears to be unlawful, service will be terminated.

Traceback

Franklin is committed to respond fully, within 24 hours, to all traceback requests from the Commission, 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.

Additional Certifying Information

Franklin certifies that all calls that they originate on their network are subject to a robocall mitigation program, and prior certification has not been removed by Commission action and they have not been prohibited from filing in the Robocall Mitigation Database.

Franklin is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing