

Glasford Telephone Co.
PO. Box 169
Glasford, Illinois 61533
Phone 309-389-2111

Robocall Mitigation Plan Description for Glasford Telephone Company

STIR/SHAKEN Extensions:

Glasford Telephone Company has received the following extension of the STIR/SHAKEN implementation deadline under §64.6304 of the FCC's rules: (1) the non-IP networks extension (§64.6304(d)).

All originating calls on the Glasford Telephone Company network are subject to the Robocall Mitigation Program measures described below.

Trace Back Requests:

Glasford Telephone Company commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that are discovered using our service to originate calls, within 24 hours.

Robocall Mitigation Measures:

- 1) Glasford Telephone Company provides our customers with a feature that allows the customer to screen calls for potentially unwanted sales and solicitation calls. This feature gives the customers a layer of protection from illegal robocalls.
- 2) Glasford Telephone Company has updated portions of the network to generate originating calls over SIP trunks. With these trunks, the originating calls can be monitored for excessive call volumes and measures are in place with our toll provider to screen for illegal robocalls generated by our long-distance customers. These SIP trunks are Stir/Shaken compliant as of June 30, 2023.
- 3) Glasford Telephone Company has worked with our billing vendor to establish monitoring of originating call volumes by our customer base. Originating call records are summarized and compared to previous volumes to check for large increases in call volumes that appear unreasonable. If such volume changes are discovered, the company will investigate the change and take appropriate action with the customer.

Status of GLASFORD TELEPHONE COMPANY STIR/SHAKEN Implementation:

As of June 30, 2023, some of the voice traffic that originates or terminates on the network of Glasford Telephone Company is authenticated or verified with STIR/SHAKEN. The SIP-based trunks that carry voice traffic have been fully implemented with Stir/Shaken authentication.

Glasford Telephone Company has also received a non-IP networks extension under §64.6304(d) of the FCC's rules, which provides the company with a continuing extension of the STIR/SHAKEN implementation deadline for those portions of its network that cannot initiate, maintain, and terminate SIP calls. Glasford Telephone Company will implement a call authentication protocol for voice calls delivered over the non-IP portions of its network that do not use SIP technology when such a protocol is fully developed and finalized by industry standards and the necessary equipment and software is available on the commercial market.

Company Information on Principals, Affiliates, Subsidiaries:

Glasford Telephone Company has no affiliated companies involved in any voice service provision. The company has no affiliates in its corporate structure.

Glasford Telephone Company is organized as a mutual concern, therefore the company has no principal individuals who own or have a controlling interest or have control over the company operations.

The company officers are primarily responsible for the business operation and management of the company. The company officers are the following individuals:

President –Damon Spenny

Vice President – Bob Hammerich

Secretary/Treasurer –Marsha Shafer

Know Your Customer issues:

The company has know-your-customer procedures in place to prevent the abuse of the network related to illegal calls before they occur. The company requires customers to provide information on the physical location for service and a contact person for each service that is provisioned. The company also has documentation regarding acceptable use of service and the prohibition of the use of service for any fraudulent activities. The company has the right to suspend service or terminate service for any customer violation of the service terms.

Company Role in call chain:

Glasford Telephone Company has the call chain role of being a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.

Third Party Vendors used in call analytics:

The company does not utilize any third parties for call analytics at this point in time. At any point where the company employs a third party for the purpose of a call analytics application, the company will timely file an update to this plan document in the Robocall Mitigation Database.

Glasford Telephone Company Primary Contact Robocall related issues:

Name:	Stan Brown
Phone Number:	309-389-2111
Email Address:	swbgtc@glastel.net