

## **Sierra Telephone Company, Inc. Robocall Mitigation Plan**

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

### **Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Calls**

Sierra Telephone has a “know-your-customer” policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic.

Specifically, for new and renewing customers, Sierra Telephone:

- Verifies that for business customers, the corporate entity and business purpose is legitimate.
- Verifies that the telephone numbers are being legitimately used.
- Verifies and educates customers regarding vertical, opt-in, and calling practices.
- Verifies and updates Caller ID, Caller Name Delivery (CNAM), and verified calls.

Although Sierra Telephone’s customers generally do not generate a high volume of calls, were the company to receive a request for high-volume origination services, Sierra Telephone would exercise caution and extensively investigate such customers/requests before granting access to the services.

In addition, in the basic terms and conditions section of Sierra Telephone’s customer account application, it explicitly states that our services cannot be used to originate illegal traffic and doing so may result in the termination of service. Sierra Telephone will not hesitate to enforce this policy if necessary.

### **“Know-Your-Upstream Provider” Procedures**

Sierra Telephone exercises due diligence prior to accepting traffic from an upstream provider as it seeks to ensure that such providers are not using Sierra Telephone to carry or process a high volume of illegal traffic. Specifically, Sierra Telephone collects 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.

### **Use of Call Analytics Systems**

Sierra Telephone has employed the [REDACTED]

[REDACTED] The profiles differentiate legitimate users from abusive, fraudulent and/or unlawful users.

In addition, Sierra Telephone has taken measures to prevent caller ID spoofing from occurring on its network by utilizing the [REDACTED] Subscribers in the switch can originate calls from their phone line only using the caller ID that is assigned to that line. If the caller ID does not match the line from which the call is originating, the call will not be connected.

### **Commitment to Respond to Traceback Requests**

Sierra Telephone 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.