

## **ROBOCALL MITIGATION PLAN**

This document describes the steps that Aeneas Communications, LLC (“Aeneas”) is taking to meet the revised Robocall Mitigation Database filing requirements and related rules adopted in the Federal Communications Commission’s (“FCC”) *Sixth Caller ID Authentication Report and Order*, WC Docket No. 17-97, Sixth Report and Order and Further Notice of Proposed Rulemaking, FCC 23-18 (rel. Mar. 17, 2023).

Pursuant to 47 CFR § 64.6305, this Robocall Mitigation Plan describes the specific steps we are taking to avoid the origination, carrying, or processing of illegal robocall traffic. We will periodically evaluate the risks we face, the effectiveness of our policies and procedures, and our capabilities to support the measures described. Should we determine that changes are appropriate, we may alter our practices from those described below. We may modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time in order to respond to changes in our business, capabilities and needs.

### **I. Filer Information**

Aeneas is a wholly-owned subsidiary of Southwest Tennessee Electric Membership Corporation (STEMC), a member-owned electric cooperative operating in Tennessee. The members of the parent cooperative elect the Board of Directors, which has appointed Kevin Murphy to be the President of STEMC. Stephen Thorpe is the CEO of Aeneas. Aeneas is offering retail voice and broadband services to customers in western Tennessee and a small number of customers across the state line in Mississippi.

### **II. STIR/SHAKEN Certification**

Aeneas hereby certifies that all voice traffic originating on its network is authenticated in compliance with the applicable standards under 47 CFR § 64.6301. Aeneas has implemented STIR/SHAKEN through use of the TNS Call Guardian Authentication Hub. This is a managed end-to-end call authentication solution that fully satisfies the FCC’s STIR/SHAKEN requirements. It provides a standardized approach to call authentication and verification (STIR – RFC 8224, RFC 8225, RFC 8226 and SHAKEN – ATIS-1000074-E, ATIS-1000080, ATIS-1000082).

### **III. Know-Your-Upstream Providers Procedures**

Aeneas has existing agreements with Tier-1 carrier service providers that are utilized to provide service to its customers. We have confirmed that each of those carriers are listed in the Robocall Mitigation Database.

### **IV. Know-Your-Customer Procedures**

We are a subsidiary of an electric cooperative, offering voice calling services and broadband to end user customers. Our retail voice customers are in or near the geographic area of our parent

electric cooperative. As such, we know our customers – our customers reside in the communities in which we operate in and are electric cooperative members.

The vast majority of our end user customers are either residential or single-party business lines. These customers are limited to one call path, thereby minimizing the overall risk of robocalls originating from our customers. We have not received information suggesting that robocalls are likely to originate on our network. Therefore, we do not consider our network at high risk of originating illegal robocalls.

As part of our standard operating procedure, we conduct due diligence on new and renewing voice customers, confirming the customer's identity and whether it is a business.

- We confirm the customer's service address for all customers.
- We verify the customer's credit history and or business reputation prior to providing service.
- We verify customer information when contracts are renewed, or services are added.
- We verify the customer's identity and their right to use the telephone number presented on calls.

For business customers, we confirm:

- Contact person
- Physical business location
- State incorporation
- Federal tax ID
- Nature of the business

## **V. Contractual Terms and Other Measures**

We have in place an enforceable terms of service/acceptable use policy that prohibits our customers from engaging in robocalling.

If we have a reasonable basis to believe that a customer is originating illegal robocalls, we will require the customer to remedy the problem and, if effective action is not taken, we can suspend and/or terminate service to the customer.

Our customers are not allowed to self-provision voice services using their broadband connection. We only sell voice services to physical locations that are on our network.

## **VI. Fraud Detection and Analytics**

We use TNS Call Guardian analytics technologies and services to monitor traffic on our network and identify potentially unlawful call origination activity. If we have a reasonable basis to believe that a customer is originating illegal robocalls, it will require the customer to remedy the problem and, if effective action is not taken, we can suspend and/or terminate service to the customer.

## **VII. Enforcement**

We commit to respond to respond 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 any illegal robocallers that use our service to carry or process calls.

We have designated an individual as a dedicated point of contact for addressing traceback requests, and a backup person to that individual. We will provide the Industry Traceback Group (“ITG”) with the contact information and business hours for those individuals upon receipt of the first request from the ITG. See <https://www.ustelecom.org/the-industry-traceback-group-itg/for-providers/>

If a pattern of questionable activity is detected, we will require our customer to remedy the problem and, if effective action is not taken, service to the customer may be suspended and/or terminated.

## **VIII. Cooperation with State and Federal Regulators**

We will cooperate with state and federal regulators to prevent any and all illegal robocalls. Specifically, we will:

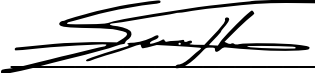
- Respond to valid law enforcement requests;
- Provide relevant non-proprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities; and
- Implement mandated robocall mitigation procedures to the fullest extent possible with the goal of maximizing the mitigation of illegal robocalls.

## **IX. Additional Certifications**

We hereby certify that we have not been prohibited from filing in the Robocall Mitigation Database.

In the prior two years, we have not been subject to an FCC, law enforcement or regulatory agency action or investigation due to alleged robocalling, or spoofing.

To conclude, Aeneas has deployed call authentication, call labeling, and call blocking services provided by TNS. We have made great strides to protect our networks and consumers from harmful calls. Aeneas is pleased to play a role in that improvement and will continue the necessary work to protect our customers.

A handwritten signature in black ink, appearing to read 'S. Thorpe', is positioned above a horizontal line.

**Stephen Thorpe, CEO**

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**02/26/2024**