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ROBOCALL MITIGATION PLAN

This Robocall Mitigation Plan describes the specific reasonable steps Midvale Telephone Company, Inc. (“MTE”) 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 Calls

MTE has a “know-your-customer” policy through which we exercise due diligence in ensuring that our services are not being used to originate illegal traffic. Specifically, for new and renewing customers, MTE:

- Confirms the customer’s identity and, if it is a business, it’s incorporation documents.
- Confirms the customer’s service address.
- Verifies customer information when contracts are renewed or services are added.
- Verifies the customer’s identity and their right to use the telephone number presented on calls.

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

In addition, MTE has an enforceable terms of use and/or acceptable use policy that defines the circumstances by which it will deny, suspend, or terminate service to a customer.

“Know-Your-Upstream Provider” Procedures

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

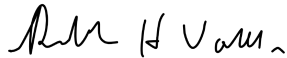
Use of Call Analytics Systems

MTE 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 MTE 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, MTE will suspend and/or terminate service to the customer.

Commitment to Respond to Traceback Requests

MTE 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 services to originate, carry, process illegal robocalls.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Vowell".

Robert Vowell

COO

Midvale Telephone Company, Inc, DBA MTE Communications, Midvale Telephone Exchange, Inc.

"Employee Owned, Community Focused, Customer Centered"
MTE Communications is an equal opportunity provider and employer