

GRAND TELEPHONE COMPANY

ROBOCALL MITIGATION PLAN

Grant Telephone Company (Grant), OCN 1994, 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).

GTC provides local service to fewer than 100,000 voice subscriber lines. The majority of customers are served on the non-IP portions of GTC's network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

Consistent with § 64.6303 (a)(1), GTC is ready to upgrade its entire network to allow for the initiation, maintenance, and termination of SIP calls and fully implement the STIR/SHAKEN framework. GTC's non-IP network is connected to carriers that do not support IP connectivity, therefore, GTC cannot upgrade its Non-IP network to IP.

GTC has implemented the following robocall mitigation plan to detect and prevent unlawful robocalls from originating on its network. All calls that originate on GTC's network are subject to the described robocall mitigation plan.

Robocall Mitigation Plan

GTC has contracted with JSI, LLC for its Robocall Origination Detection Service. JSI downloads GTC's CDRs and checks for patterns indicative of originating robocalls. JSI provides GTC a report identifying the suspected illegal robocall activity for investigation.

If it is determined a Grand Telephone Company customer is originating prohibited unlawful robocalls on our network, Grand Telephone Company will either warn the customer to stop or terminate their service as allowed per Grand Telephone Company's policy.

Upstream Provider Knowledge

GTC knows all the carriers from which it receives traffic and has confirmed that all of the carriers are listed in the Robocall Mitigation Database. Grand monitors incoming traffic from all connected carriers for suspicious call patterns indicative of illegal robocall activity, notifies the upstream carriers of any such traffic and warns the carriers that if the traffic does not cease, the calls may be blocked from entering Grand's network. In addition, Grand is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.

Know Your Customer

Grand Telephone Company has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Grand Telephone Company thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services.

Traceback

Grand commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to originate calls. Grand commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within twenty-four (24) hours.