

Roggen Telephone Cooperative Company
Roggen Enterprises Broadband LLC.
Robocall Mitigation Plan Description

1. **Roggen Telephone Cooperative Company (RTCC)** Maintains a “Know Your Customer policy”. Designed to prevent new and existing customers from using RTCC’s network to originate illegal calls. RTCC does not allow new or renewing customers seeking high volume originating services and will remove customer from service if found doing so.
2. **RTCC** has Implement a “**Know Your Upstream Providers**” This included collecting information from upstream providers such as physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of the upstream provider’s business. If and when necessary, RTCC will take additional steps, such as using contract terms and conditions that allow termination of the traffic exchange in the event the upstream provider attempts to use RTCC’s network to process a high volume of illegal traffic.
3. **RTCC** Commits to respond to all trace back requests from the Commission, law enforcement, and industry trace back consortium, and to cooperate with such entities in investigating and stopping any illegal traffic that uses its service to originate calls. RTCC has designated a traceback response contact(s) who are aware of the traceback requirements contained in 47 C.F.R. §64.1200(n)(1) and the obligations contained in 47 C.F.R. §64.1200(n)(2) in the event the RTCC receives notification of a traceback request. Upon receipt of any traceback request RTCC will determine if it originated on RTCC’s network and respond accordingly to mitigate the traffic immediately.
4. **RTCC** has taken the following specific steps to detect originating robocall traffic:
 - a. Implemented a no access to Voice switch using voip technologies from outside of our network and firewall implementations to only allow access to our current customer within our local exchange. Any attempt to access Voice services is logged and monitored weekly.
 - b. Inteliquent dba SINCH. Is providing robocall mitigation for upstream and logs and reports any anomalies in traffic.
 - c. Review of originating call from local switch are logged and reviewed on weekly basis any network anomalies are reviewed and addressed accordingly.
5. **RTCC will be implementing in future for migration of** originating robocalling traffic upon detection:
 - a. Sinch will be a hosted Switch provider for RTCC originating calls. They will be provides our robo calling mitigation as lines are migrated over to their hosted switches.