

Robocall Mitigation Policy

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Robocall Mitigation Compliance with TRACED Act Date	On Behalf of	Contact/Title	Change Summary
June 13, 2025	Haviland Telephone Co., Inc. JBN Telephone Co., Inc. Giant Communications	Brent Swingle, Voice Manager	Update to include details on Know Your Customer

This update is submitted on behalf of the companies listed above (“Haviland, JBN, and Giant” or “the Companies”). Haviland, JBN, and Giant provide both competitive and incumbent local exchange services in Kansas. All the companies listed above share management.

I. Implementation and Extension Status

Extensions Received Under 47 C.F.R. §64.6304

The Companies are 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).

The Companies have implemented authentication and verification with STIR/SHAKEN voice traffic that originates and terminates on the IP portions of the company’s network that support SIP calls using the Ribbon Call Trust Solution.

II. Robocall Mitigation Plan

The Companies are voice service providers and all calls that originate on their networks are subject to the company’s robocall mitigation plan. The Companies use Call Analytics and Know Your Customer to prevent the origination of robocall traffic on its network. All carriers/upstream providers to which we are connected appear on the Robocall Mitigation Database and their traffic is subject to the same mitigation plan as that of its own end users.

Call Analytics

The Companies have deployed a Ribbon Call History Server to monitor against suspicious calling activities including high call volumes, including excessive short duration calling and high volumes of non-completed calls.

Know Your Customer

The Companies utilize the mitigation technique of “Know Your Customer.” Business practices require that we personally meet each of our customers in person at one or more of the following opportunities: (1) our business office sales counters, (2) the customer’s premise during direct sales efforts, and (3) the customer’s place of residence or business during the service installation process.

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The Companies are small, long-established providers that maintain a close relationship with its subscribers. Its customers are generally “mom and pop” users and few of its total customer base have enough call paths to generate the high volume of traffic associated with robocalling allowing us to use targeted in-house analytics to monitor, alert and apprehend suspected robocalling activities.

III. Traceback and Enforcement Cooperation

The Companies will actively participate in the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG). The Companies commit to respond within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium and will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

IV. Additional Certifications

Neither Haviland, JBN, or Giant nor any entity which shares common ownership, management, directors, or control has been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.