



ROBOCALL MITIGATION PLAN

This Robocall Mitigation Plan describes the specific reasonable steps that Public Service Communications, Inc. and its subsidiaries, Public Service Telephone Company (PSTC) and Public Service Wireless (PSW), have 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

PSTC/PSW has a “know-your-customer” policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. Prior to service establishment with PSTC/PSW, customers must provide identification information to support their request for service. This information may include, but is not limited to: Full name, complete address, social security number for credit check and security deposit, and federal tax ID (if applicable).

As a small rural service provider serving less than 3,800 access lines in central Georgia, PSTC/PSW is especially familiar with its business customers and has trained customer representatives to manage the relationships with those customers. This personal touch gives PSTC/PSW a clear view of whether or not a business customer presents a risk for originating illegal robocalls.

PSTC/PSW’s business customers are mostly small businesses, and it is very rare for us to receive a request for high-volume origination services. However, if PSTC/PSW does receive such a request, we exercise caution and extensively investigate the requesting entity prior to providing service. This includes collecting information such as their physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the general nature of their business.

PSTC/PSW’s softswitch only allows customers to originate calls from a number that has been assigned to them. Attempts to originate a call from a number not assigned to a customer will be blocked from being completed. This prevents caller ID spoofing and greatly mitigates the likelihood of illegal robocalls originating on PSTC/PSW’s network.

PSTC/PSW maintains call logs and tracks the number and length of calls that travel over its SIP and TDM trunks. If it is discovered that a customer is originating an unusually high number of calls and/or there are calling patterns associated with illegal robocalling, the customer will be contacted to determine whether illegal robocalls are being made.

Special requirements or clarifications for high-volume calling that is determined to be lawful will be documented and handled on a case-by-case basis. If necessary, special contracts will be established to clarify the proper use of call origination services and service will be terminated for abuses.

PSTC/PSW's "Terms and Conditions" document states that subscriber telephone service is furnished subject to the condition that it will not be used for an unlawful purpose. Service will be discontinued if any law enforcement agency, acting within its apparent jurisdiction, advises in writing that such service is being used in violation of law. PSTC/PSW will refuse to furnish service when it has reasonable grounds to believe that such service will be used in violation of law.

"Know-Your-Upstream Provider" Procedures

Most of the connections that PSTC/PSW has with upstream providers have been in place for many years, and we know these companies very well. PSTC/PSW has confirmed that all carriers from which it receives traffic are listed in the Robocall Mitigation Database. In addition, PSTC/PSW has reviewed the Robocall Mitigation Plans of the upstream providers to ascertain how they monitor their traffic to mitigate illegal robocalls.

Before accepting traffic from any new upstream provider, PSTC/PSW would exercise due diligence and seek to ensure that the provider is not using PSTC/PSW to carry or process a high volume of illegal traffic. Specifically, PSTC/PSW would collect 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. Also, PSTC/PSW now requires traceback and prohibited traffic language in all contractual agreements with upstream providers.

Use of Call Analytics Systems

PSTC/PSW does not presently use any call analytics systems to identify and block illegal robocall traffic.

Commitment to Respond to Traceback Requests

PSTC/PSW 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 service to originate, carry, or process illegal robocalls.