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STIR/SHAKEN Extensions

Elkhart Telephone Co., Inc. (Company) is eligible for the STIR/SHAKEN implementation extension received under 47 CFR § 64.6304 and the non-IP networks extension (§64.6304(d))

Voice Service Provider Information:

Elkhart Telephone Co, Inc., OCN 1764, 610 S Cosmos, PO Box 817, Elkhart, KS 67950
(other business names in use: Epic Touch Co)

Principals, affiliates, subsidiaries, and parent companies:

Parent Company: Epic Touch Co, Inc. FRN 00004923934, PO Box 1260, Elkhart, KS 67950

Neither Epic Touch Co nor Elkhart Telephone is a foreign voice service provider.

Individual responsible for addressing robocall mitigation related issues:

Harvey Taylor, Interim Chief Operations Officer
PO Box 817, 610 S Cosmos, Elkhart, KS 67950
(620)697-2111, htaylor@epictouch.com

Traceback

Company will respond to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and cooperate with such entities within 24 hours in investigating and stopping any entity that is suspected of using our service to originate illegal robocalls.

Robocall Mitigation

Company has the following policies and procedures in place to help mitigate originating illegal robocalling traffic on our network.

- a. Know our customers. Prospective customers are vetted to verify their business entity and the legitimacy of their business purpose.
- b. Company requires all business customers to adhere to company's written policy that allow for the suspension or termination of services in the event of high-volume or unlawful originating services abuse.
- c. Company uses billing software and polled switch records to monitor originating voice traffic for suspicious or abnormal call volume or activity. Company has below 650 access lines. With low traffic levels that are relatively stable, if a bad actor(s) would begin originating illegal calls, it would be easily detectible by the change in call volume. The details in these reports help identify suspected illegal robocalls. If Company determines that the caller was attempting to originate unlawful robocalls, then Company either warns them to stop or terminate their service as appropriate.

- d. Company encourages and educates customers on using the Do Not Call Registry to avoid robocalling.**
- e. Company has enforceable terms of service in place and prohibit use of telephone numbers for illegal purposes.**
- f. Company has long standing working relationships with upstream carriers from which it receives traffic and has confirmed all carriers it exchanges traffic with are listed in the Robocall Mitigation Database. Going forward, all interconnection agreements will include prohibited traffic and traceback language.**