

New Hope Telephone Cooperative ROBOCALL MITIGATION PLAN

New Hope Telephone Cooperative (NHTC), Operating Company Number (OCN): 0239, FCC Registration Number (FRN): 0002071579, has its principal place of business at 555 Battlefield Road, Fort Defiance, VA 24437. Pursuant to §64.6304 (a)(2), NHTC is a small voice service provider.

NHTC provides local service to fewer than 1,000 voice subscriber lines. All NHTC voice customers are served on a non-IP network that relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

Robocall Mitigation Plan

All voice traffic on the NHTC network is subject to the following parameters.

Customer Knowledge

NHTC has a long history of having a close relationship with each of its customers including understanding their needs and use for voice services.

New Customers

All new customers go through a verification process which includes personal identity verification for residential and business customers. Business and Enterprise Customers are processed with a thorough business identity check. Additionally, NHTC seeks to understand each customer's use for all telecommunications services. NHTC verifies customer information during the installation process for both Caller ID and CNAM.

Existing Customers

NHTC requires signed updates on all renewals and additions by an authorized account holder to submitted or existing orders.

New and existing customers will receive informational material regarding Robocalls and legal ramifications associated with infractions.

Upstream Provider Knowledge

NHTC knows the connected carriers it receives traffic from. NHTC has reviewed the Robocall Mitigation Database to ensure these carriers have filed robocall mitigation plans to learn how they monitor their originating traffic to mitigate illegal robocalls. NHTC monitors incoming traffic for suspicious call patterns that might indicate illegal robocall activity. If there is any suspicious or illegal traffic identified, the connecting carrier is notified. If the traffic does not cease or if traffic is from a carrier not listed in the Robocall Mitigation Database, then calls may be blocked from entering NHTC's network. No carrier is using NHTC's network to carry or process a high volume of illegal traffic.

Traceback

NHTC commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that NHTC determines are using NHTC's service to originate calls. NHTC commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium within 24 hours. To facilitate this process, New Hope Telephone Cooperative has implemented an upgraded Call History Server (CHS) from Ribbon Communications.

Robocall Mitigation Plan Details

All lines can only dial out as the number designated to that specific voice line. Each line can only place one call at a time. In addition to the above-mentioned CHS from Ribbon Communications, New Hope Telephone Cooperative will also have access to the Identity Hub Scoring and Verification. This Scoring method determines the likelihood that a call should be blocked. A call could be blocked if:

- The originating Telephone Number shows up on a Do-Not-Originate list or is an unallocated, unused, or invalid number.
- Reasonable analytics indicated the call is highly likely to be illegitimate and malicious in intent.

Enforcement

Illegal robocalls and fraudulent spoofing is prohibited on NHTC's network. If it is determined, a NHTC customer is using its network to fraudulently spoof calls or to originate illegal robocalls, NHTC will warn the customer to stop such practices or terminate their service.

Robocall Mitigation Database Eligibility

NHTC has not, within the prior two years, been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling.

NHTC has not been prohibited from filing in the Robocall Mitigation Database (RMD).