

## **GUADALUPE VALLEY TELEPHONE COOPERATIVE, INC.**

### **ROBOCALL MITIGATION PLAN**

This Robocall Mitigation Plan describes the specific reasonable steps that Guadalupe Valley Telephone Cooperative, Inc. ("GVTC") has 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 Robocalls**

GVTC has a "know-your-customer" policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. Specifically, for new and renewing customers, GVTC:

- Confirms the customer's identity and, if it is a business, its incorporation documents.
- Confirms the customer's service address.
- Verifies the customer's credit history and business reputation.
- Verifies customer information when contracts are renewed or services are added.
- Verifies the customer's identity and their right to use the telephone number presented on calls.

Although GVTC's customers generally do not generate a high volume of calls, were the Company to receive a request for high-volume origination services, it would exercise caution and extensively investigate such customers before granting access to the services.

In addition, GVTC has policies that define the circumstances by which it will deny, suspend or terminate service to a customer.

#### **"Know-Your-Upstream Provider" Procedures**

Most of the connections that GVTC has with upstream providers have been in place for many years, and we know these companies very well. GVTC has confirmed that all of the upstream providers that it receives traffic from are listed in the Robocall Mitigation Database. GVTC has also reviewed the upstream providers' robocall mitigation plans to learn how they monitor the traffic they carry to mitigate illegal robocalls.

GVTC exercises due diligence before accepting traffic from any new upstream provider as we seek to ensure that such providers are not using GVTC to carry or process a high volume of illegal traffic. Specifically, GVTC collects 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.

### **Use of Call Analytics Systems**

GVTC uses Transaction Network Services (TNS) Call Guardian analytics technologies and services to monitor traffic on its network and identify potentially unlawful call origination activity. If GVTC has a reasonable basis to believe that a customer is originating illegal robocalls, it will require the customer to remedy the problem. If effective action is not taken, GVTC will suspend and/or terminate service to the customer.

GVTC blocks the following types of calls by default:

- Calls that purport to be from invalid, unallocated, or unused numbers.
- Calls from phone numbers on a D-Not-Originate list.

### **Commitment to Respond to Traceback Requests**

GVTC 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 services to originate, carry, process illegal robocalls.