



TELEPHONE COMPANY

PO Box 249, Pineville, NC 28134
(704) 889-2001

**Town of Pineville dba Pineville Telephone Co
Pineville Communications Systems
ROBOCALL MITIGATION PLAN**

Town of Pineville dba Pineville Telephone Co and Pineville Communications Systems (Pineville), Operating Company Numbers (0494 and 867A), are eligible for the continuing extension of the STIR SHAKEN implementation deadline on Non-IP networks as small voice service providers (§64.6304 (a)(2) that have non-IP portions within its networks §64.6304(d).

Pineville provides local service to fewer than 600 voice subscriber lines. The majority of customers are served on the non-IP portions of Pineville's network which relies on technology that cannot initiate, maintain, cany, process, and terminate SIP calls.

Consistent with§ 64.6303 (a)(l), Pineville is ready to upgrade its entire network to allow for the initiation, maintenance, and termination of SIP calls and fully implement the STIR/SHAKEN framework. However, Pineville's non-IP network is connected to carriers that do not support IP connectivity; therefore, Pineville cannot upgrade those Non-IP portions of its network to IP connectivity.

Pineville's network also has IP-portions which originates calls via SIP connections to other carriers. Pineville has registered with the Policy Administrator and is an authorized service provider in the STIRISHAKEN ecosystem. Pineville has implemented STIRISHAKEN within the IP portions of its network and signs the calls originating on the IP portions of its network.

RobocaU Mitigation Plan

All voice traffic that originates on Pineville's network is subject to the following Robocall Mitigation Plan.

Call Analytics

Pineville has contracted with Ribbon to provide robocall analytics and reputation scoring of our network's outbound traffic. The vendor uses software to monitor outbound voice traffic in real time and provides detailed reports identifying if our network originates any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. Pineville receives notifications about telephone numbers originating suspected illegal robocalls on its network. The software's identification of suspected illegal robocalls and alerts helps prevent the origination of illegal robocalls.

Investigation

Pineville investigates calls identified by Ribbon as suspicious calls or those that have abnormal call volumes, patterns or activity consistent with illegal robocalls.

In addition, if Pineville has any other reason to suspect illegal robocalling or spoofing is taking place over its network, Pineville will work internally to identify the party that is using our network to originate, route, or terminate such calls and take appropriate action.

Enforcement

Illegal robocalls and fraudulent spoofing is prohibited on our network. If it is determined a Pineville customer is using our network to fraudulently spoof calls or to originate illegal robocalls, Pineville will either warn the customer to stop such practices or terminate their service as allowed per Pineville's service policy.

All Pineville customers receive a service agreement before new service is activated or existing service is renewed. The service arrangement includes notice that Pineville prohibits use of its network for the initiation of fraudulent spoofing and robocalls and if end users are found in violate of the service terms, the end user's service may be terminated.

Know your Customer

Pineville has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Pineville thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services.

Residential customers are asked to provide their full name, address (physical and mailing, if different), date of birth, phone number. Town of Pineville dba Pineville Telephone Company and Pineville Communication Systems also requires a photo ID for all new customers requesting voice service.

Business customers are asked to provide their full name, address (physical and mailing, if different), tax identification number, phone number, email. To initiate an account change, a customer must provide tax identification prior to initiating a change. If the customer is unable to provide that information the customer service representative will call the customer back using the number they provided at account setup.

Upstream Provider Knowledge

Pineville knows all the carriers from which it receives traffic and has confirmed that all the carriers are listed in the Robocall Mitigation Database. No provider is using Pineville's network to carry or process a high volume of illegal traffic. Pineville monitors incoming traffic from all connected carriers for suspicious call patterns indicative of illegal robocall activity. The connected carriers are made aware of any suspicious or illegal traffic and notified that, if the traffic does not cease, the calls may be blocked from entering Pineville's network. In addition, Pineville is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.

Traceback

Pineville commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to originate calls. Pineville commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within twenty-four (24) hours.