

## Robocall Mitigation Compliance with TRACED Act

---

| Date      | On behalf of                                             | Change Summary      |
|-----------|----------------------------------------------------------|---------------------|
| 19-Feb-26 | The Hancock Telephone Company<br>HLD Long Distance, Inc. | Clarifying language |

This response is submitted on behalf of Hancock Telephone Company, an incumbent local exchange carrier, and HLD Long Distance, a provider of competitive voice services, including VOIP. The companies (collectively referred to as “Hancock”) share operations, including their Robocall Mitigation Plan.

### **I. Implementation and Extension Status**

#### Extensions Received Under 47 C.F.R. §64.6304

Hancock is eligible for the continuing extension of the STIR SHAKEN implementation deadline as a small voice service provider (§64.6304 (a)(2) that has non-IP portions within its network §64.6304(d).

Hancock maintains active affiliation with industry representatives (including NECA and several of its equipment vendors) who participate on the ATIS Non-IP taskforce working group which developed the (ATIS Solutions) non-IP call authentication solutions and serves as Hancock’s third-party representative on the ATIS Non-IP taskforce working group.:

#### Status of STIR/SHAKEN Implementation

Hancock has implemented the STIR/SHAKEN authentication framework on a portion of its network, and all calls it originates on that portion of its network are compliant with sections 64.6301(a)(1) and (2).

Hancock subscribes to Ribbon’s Identity Hub Service which provides the company access to a complete STIR/SHAKEN solution. Hancock uses Ribbon’s service for the Secure Telephone Identity – Authentication Service and the Secure Telephone Identity – Verification Service functions. Hancock has its own STIR/SHAKEN certificate which is issued by Ribbon.

Hancock has implemented STIR/SHAKEN in parts of its network in which it may do so and has implemented this policy for those portions of its network not yet compliant.

### **II. Robocall Mitigation Plan**

Hancock is a voice service provider and all calls that originate on its network are subject to the company’s robocall mitigation plan. Hancock uses Call Analytics and Know Your Customer to prevent the origination of robocall traffic on its network. All carriers to which Hancock are connected appear on the Robocall Mitigation Database and their traffic is subject to the same mitigation plan as that of its own end users.

#### Analytics

Hancock has deployed a Robocall Mitigation Program for all originating calls made from our Network using the Ribbon Communications Call Trust Platform. All outbound calls made from our subscribers will be analyzed by the Ribbon Call Trust Platform, which provides real time, detailed information and reporting on all originating calls. The Trust Platform provides call analytics/reputation Scoring that

## **Robocall Mitigation Compliance with TRACED Act**

---

assist in identifying calls that may contain an invalid calling number or are identified to be disconnected, unallocated or a potentially problematic number. We will immediately investigate any potential robo or suspicious call, and if warranted, we will notify the customer to stop originating unlawful calls and will terminate their service if necessary to prevent the origination of robocalls.

Calls originating from Invalid or problematic numbers, as well as other numbers which meet the Reputation scoring threshold based upon their calling patterns and history, are blocked automatically by the Mitigation Platform.

### **Know Your Customer**

Nearly 90% of current customers are either residential or single-party business lines. These customers are limited to one call path, thereby minimizing the overall risk of Robocalls originating from the Company's customers. The Company works with its customers that may place legitimate Robocalls to ensure their traffic is not blocked. Examples include school districts that might use automated calling to announce snow days or the local Water and Sewer Dept that may contact customers to report Boil advisories and/or outages.

New customers requesting an excessive number of call paths are screened for legitimate call usage needs.

### **General Prohibition Against Illegal Robocalling**

Any customer making robocalls may have their service suspended or terminated under the terms and conditions contained in the Company's Acceptable Use Policy and local service tariff.

Activities normally associated with Robocalling are prohibited including, but not limited to:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable local, state, or federal law; using the Hancock service to engage in or in connection with fraudulent activities

## **III. Traceback and Enforcement Cooperation**

Hancock will actively participate the traceback community including the FCC, law enforcement, and The Industry Traceback Group. The company commitments to respond within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium and will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

## **IV. Additional Certifications**

Neither Hancock nor any entity with which it shares common ownership, management, directors, or control have been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.