

VTel Wireless, Inc.
ROBOCALL MITIGATION PLAN

VTel Wireless, Inc. (VTW), Operating Company Number 9814, 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).

VTW provides local service to fewer than 100,000 voice subscriber lines. The majority of customers are served on the non-IP portions of VTW's network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

To meet the non-IP network criteria for the continuing STIR SHAKEN extension (§ 64.6303 (a)(2)), VTW is a member of NTCA. NTCA participates on the ATIS Non-IP taskforce working group which developed the (ATIS Solutions) non-IP call authentication solutions. NTCA is serving as VTW's third party representative on the ATIS Non-IP taskforce working group.

Consistent with § 64.6303 (a)(1), VTW 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. VTW has contacted all of its connected carriers and requested to convert the Non-IP connections to IP connections. The carrier (optional to name the carriers) stated they cannot support IP connections at this time.

VTW also originates calls via SIP connections within its network. Vermont Telephone Company and VTW share the same switch, VTW is the wireless entity under Vermont Telephone Company. Vermont Telephone Company has registered with the Policy Administrator and is an authorized service provider in the STIR|SHAKEN ecosystem. Vermont Telephone Company has implemented STIR|SHAKEN within its IP-network and signs the VTW calls originating on the IP portions of VTW's network.

Robocall Mitigation Plan

All calls that originate on VTW's network are subject to the described robocall mitigation program.

Internal Traffic Monitoring & Analytics

VTW blocks calls originating from numbers that are not valid North American Numbering Plan (NANP) numbers, known numbers not allocated to a provider and numbers not assigned to a VTW subscriber or otherwise set aside for outbound call use.

VTW has contracted with Neustar to provide robocall analytics and reputation scoring of our network's outbound traffic. The Neustar analytics identify patterns of suspected illegal robocalls and scores the calls based on their behavior and/or their status as suspected robocalls as reported to the Federal Communications Commission (FCC), Federal Trade Commission (FTC), and as reported by other carriers. VTW has access to the Neustar's portal and receives real-time notifications about telephone numbers originating suspected illegal robocalls on its network, including from unassigned, inactive and do-not-originate TNs. VTW will also receive reports via

e-mail alerts if any of its numbers experience a change in reputation such as suspicious traffic patterns or other detected anomalies outside the normal behaviour of our company's traffic. VTW will examine the reports and investigate and identify the source of the calls as unlawful or legitimate.

Investigation

VTW investigates calls identified by its analytics vendor and internal traffic monitoring as suspicious calls or those that have abnormal call volumes, patterns or activity consistent with illegal robocalls.

In addition, if VTW has any other reason to suspect illegal robocalling or spoofing is taking place over its network, VTW 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 VTW customer is using our network to fraudulently spoof calls or to originate illegal robocalls, VTW will either warn the customer to stop such practices or terminate their service as allowed per VTW policy.

Know your Customer

VTW has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. VTW 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. VTW also requires a photo ID for all new customers requesting voice service.

All new and renewing VTW customers receive notice of the VTW Terms of Service which includes notice that VTW 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.

Upstream Provider Knowledge

VTW knows all the carriers from which it receives traffic and has confirmed that all its connected carriers are listed in the Robocall Mitigation Database.

VTW has also reviewed the connected carrier's RMPs to learn how the carriers monitor their originating traffic to mitigation illegal robocalls.

In addition, VTW is now incorporating traceback and prohibited traffic language in all contractual agreements with upstream carriers.

Role In the Call Chain

VTW is a voice service provider with a STIR/SHAKEN implementation obligation on the IP-Portions of its network. VTW is also a voice service provider without a STIR/SHAKEN

obligation on the Non-IP portions of its network because that portion of VTW's network relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

Traceback

VTW 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. VTW will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium fully and in a timely manner within twenty-four (24) hours.

Robocall Mitigation Database Eligibility

VTW has not been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling.

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

Customer Education

VTW posts information on its website to educate customers on how to protect themselves from becoming a victim of unlawful robocalls and a process to report complaints related to robocall activity.