

Robocall Mitigation Plan Description for Tonica Telephone Company

STIR/SHAKEN Extensions:

Tonica Telephone Company has received the following extension of the STIR/SHAKEN implementation deadline under §64.6304 of the FCC's rules: (1) the non-IP networks extension (§64.6304(d)).

All originating calls on the Tonica Telephone network are subject to the Robocall Mitigation Program measures described below.

Trace Back Requests:

TONICA TELEPHONE COMPANY commits to cooperating and with and responding to the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that are discovered using our service to originate calls, within twenty-four (24) hours.

Robocall Mitigation Measures:

- 1) TONICA TELEPHONE COMPANY provides our customers with a feature that allows the customer to screen calls for potentially unwanted sales and solicitation calls. This feature gives the customers a layer of protection from illegal robocalls.
- 2) TONICA TELEPHONE COMPANY has updated portions of the network to generate originating calls over SIP trunks. With these trunks, the originating calls can be monitored for excessive call volumes and measures are in place with our toll provider to screen for illegal robocalls generated by our long-distance customers.
- 3) TONICA TELEPHONE COMPANY has worked with our billing vendor to identify the reports necessary for the monitoring of originating call volumes by our customer base. Originating call records are summarized and compared to previous volumes to check for large increases in call volumes that appear unreasonable. If such volume changes are discovered, the company will investigate the change and take appropriate action with the customer.
- 4) TONICA TELEPHONE COMPANY has the capability to monitor originating call volumes by customer line, and we have implemented a call volume trigger if originating call volumes for particular customer lines break a certain threshold during the course of a monitoring period.

Status of TONICA TELEPHONE COMPANY STIR/SHAKEN Implementation:

As of February 15, 2024, the portion of the voice traffic that is still TDM signaling-based for originating and terminating calls is not authenticated or verified with STIR/SHAKEN.

TONICA TELEPHONE COMPANY has also received a non-IP networks extension under §64.6304(d) of the FCC's rules, which provides the company with a continuing extension of the STIR/SHAKEN implementation deadline for those portions of its network that cannot initiate, maintain, and terminate SIP calls.

As of June 30, 2023, TONICA TELEPHONE COMPANY has been authenticating and verifying with STIR/SHAKEN voice traffic that originates and terminates on the IP portions of the company's network that support SIP calls.

In addition, TONICA TELEPHONE COMPANY will implement a call authentication protocol for voice calls delivered over the non-IP portions of its network that do not use SIP technology when such a protocol is fully developed and finalized by industry standards and the necessary equipment and software is available on the commercial market.

Company Information on Principals, Affiliates, Subsidiaries:

TONICA TELEPHONE COMPANY has a holding company affiliate, Tonica Technologies, Inc. The company also has a resale toll affiliate company, Toncom, Inc. Tonica Telephone Company is a wholly-owned subsidiary of Tonica Technologies, Inc. There is no principal or individual who owns a controlling interest Tonica Technologies, Inc., or who has control over the company operations.

Third Party Vendors used in call analytics:

The company does not utilize any third parties for call analytics at this point in time. At any point where the company employs a third party for the purpose of a call analytics application, the company will timely file an update to this plan document in the Robocall Mitigation Database.

Company Role in call chain:

TONICA TELEPHONE COMPANY has the call chain role of being a voice provider with a STIR/SHAKEN implementation obligation serving end-users.

TONICA TELEPHONE COMPANY Primary Contact Information Robocall related issues:

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