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The North-Eastern Pennsylvania Telephone Company
NEP Long Distance
NEP Telcom (DBA; Penn Broadband)
Robocall Mitigation Plan v.4 Updated 10/9/2024

Certification

I, Steven D. Tourje, President of The North-Eastern Pennsylvania Telephone Company, hereby certifies that The North-Eastern Pennsylvania Telephone Company, along with our subsidiary's, NEP Long Distance, and NEP Telcom (DBA; Penn Broadband), hereinafter the Company has partially implemented STIR/SHAKEN authentication in portions of its network. This network is non-IP and subject to a deployment extension set forth in 47 CFR § 64.6304(d) as further explained in this document.

The Company has not been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation within the last two years due to suspected unlawful robocalling or spoofing.

The Company has not been prohibited from filing in the Robocall Mitigation Database.

Know Your Customer

The Company follows the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

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 electric utilities that may contact customers to report network outages.

Any customer making Robocalls may have their service terminated under the terms and conditions contained in the Company's local service tariff. For the North-Eastern Pennsylvania Telephone Company, see PA P.U.C. No. 9, which allows the Company to terminate service when it discovers fraud or abuse. See General Regulations, Suspension, Termination or Refusal of Service. For Penn Broadband see PA P.U.C. No. 1, section 2.2.1 Prohibited Uses.

Know Your Upstream Provider

The Company knows all the carriers from which it receives traffic and has confirmed that all carriers in which it exchanges traffic and from which it receives traffic are listed in the Robocall Mitigation Database. Basic identification information, such as physical business location, contact person(s), state of incorporation, and nature of business, are collected for all of the Company's up-stream providers. Going forward, all interconnection agreements will include prohibited traffic and traceback language.

Traceback

The North-Eastern Pennsylvania Telephone Company and its subsidiaries respond to all traceback requests from the Commission, law enforcement and the registered traceback consortium and cooperates with such entities in investigating and stopping any illegal robocallers that use our service to originate calls.

Robocall Mitigation Program

The North-Eastern Pennsylvania Telephone Company and its subsidiaries have committed to 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 that 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 or terminate their service as appropriate.