

Adams Telephone Co-Operative

Robocall Mitigation Plan

Revision Date: May 19, 2026

Adams Telephone Co-Operative (Adams), OCN 0976, is a small/rural carrier eligible for the continuing extension of the STIR SHAKEN implementation deadline on Non-IP networks as a small voice service provider (§64.6304 (a)(2) that has non-IP portions within its network §64.6304(d).

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

Adams has contracted with Voyant Solutions LLC (Voyant) for cloud switching services for a portion of its customers.

The Adams network also has some IP-portions which originate calls via SIP connections to other carriers.

Principals, Affiliates, Subsidiaries, and Parent Companies

Adams Telephone Co-Operative is a member-owned ILEC operating in Illinois serving 13 telephone exchanges. Adams Telcom, Inc. is a wholly owned subsidiary of Adams Telephone Co-Operative providing non-telecommunication services. Adams TelSystems, Inc. is a wholly owned subsidiary of Adams Telcom, Inc. providing telecommunication services in non-ILEC areas. James W. Broemmer, Jr is the CEO of Adams Telephone Co-Operative and of its subsidiaries. Michael J. Ridder is the Chief Operating Officer of Adams Telephone Co-Operative and of its subsidiaries.

Robocall Mitigation Plan

STIR/SHAKEN Implementation

Adams has registered with the Policy Administrator and is an authorized service provider in the STIR|SHAKEN ecosystem. Adams has implemented STIR|SHAKEN within the IP portions of its network and signs the calls originating on the IP portions of the Adams network.

For calls originating from our third-party vendor Voyant, Adams relies on Voyant's infrastructure to perform the act of signing and attestation. Voyant has registered with the Policy Administrator and is an authorized service provider in the STIR|SHAKEN ecosystem. Voyant has implemented STIR|SHAKEN within the IP portions of its network and signs the calls originating on the IP

portions of the Voyant network.

Call Analytics

Adams blocks calls originating from numbers that are not valid North American Numbering Plan (NANP) numbers, numbers that are listed as Do-Not-Originate, known numbers not allocated to a provider and numbers not assigned to an Adams subscriber or otherwise set aside for outbound call use.

Adams has contracted with Ribbon Communications (Ribbon) to provide robocall analytics and reputation scoring of inbound and outbound traffic on the Adams network. Ribbon's 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. Ribbon identifies calls originating from numbers that are in their Do-Not-Originate lists, are not valid North American Numbering Pan (NANP) numbers, and numbers listed in their Do-Not-Originate (DNO) database. Adams has access to the Ribbon IDH Manager where reports are available showing telephone numbers originating suspected illegal robocalls on its network, including from unassigned, inactive and do-not-originate TNs. Adams examines the reports and investigates and identifies the source of the calls as unlawful or legitimate.

For calls originating from our third-party vendor Voyant, Adams relies on Voyant's infrastructure to perform robocall analytics and reputation scoring of their network's inbound and outbound traffic. Voyant blocks suspected robocalls originating from their network, as well as calls from Do-Not-Originate lists and not valid North American Numbering Plan (NANP) numbers.

Investigation

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

In addition, if Adams has any other reason to suspect illegal robocalling or spoofing is taking place over its network, Adams 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 are prohibited by our customers. If it is determined an Adams customer is using our network or our vendor Voyant's network to fraudulently spoof calls or to originate illegal robocalls, Adams will either warn the customer to stop such practices or terminate their service as allowed per Adams policy.

Know Your Customer (KYC)

Adams has procedures in place to prevent new & renewing customers from using our network or our vendor Voyant's network to originate illegal robocalls. Prior to activating or modifying service

for any customer that can originate outbound calls, Adams verifies customer identity and service legitimacy using documented account validation steps (e.g., identity/account verification questions and validation of contact and billing information). Adams escalates for additional review when origination patterns, requested service characteristics, or other indicators suggest elevated robocall risk. Adams retains onboarding/validation records consistent with company recordkeeping practices and will suspend, restrict, or terminate service if illegal robocalling is identified.

Upstream Provider Knowledge

Adams knows all the carriers from which it receives traffic and has confirmed that all the carriers are listed in the Robocall Mitigation Database. Adams has also reviewed the connected carrier's robocall mitigation plans to learn how the carriers monitor their originating traffic to mitigate illegal robocalls. Adams does not directly receive traffic from any foreign originating or intermediate provider. No provider uses Adams's network to carry or process a high volume of illegal traffic. In addition, Adams is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.

Adams contracts with Voyant for 3rd-party cloud switching services and has confirmed that Voyant's publicly filed mitigation plan meets or exceeds our standards. Adams' service agreement with Voyant mandates their full cooperation with the Industry Traceback Group and compliance with all STIR/SHAKEN mandates.

Traceback

Adams and its vendor Voyant commit 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. Adams and its vendor Voyant commit to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within twenty-four (24) hours.

Robocall Mitigation Database Eligibility

Adams nor its vendor Voyant have not ever been involved in any formal law enforcement or regulatory investigation into suspected unlawful robocalling.

Adams nor Voyant have been prohibited from filing in the Robocall Mitigation Database (RMD).

RMD Updates / Material Changes

Adams commits to updating the FCC Robocall Mitigation Database filing information, including any material changes to the information provided in the certification process, within ten (10) business days of the change.

Customer Education

Adams posts information on its website to educate customers on how to protect themselves from

becoming a victim of unlawful robocalls and to report complaints related to robocall activity.