

HIGHLAND TELEPHONE COOPERATIVE ROBOCALL MITIGATION PROGRAM

Highland Telephone Cooperative (Highland) Is a small/rural carrier eligible for the STIR SHAKEN extension granted to small voice service providers with fewer than 100,000 voice subscriber lines under 47 CFR § 64.6304.

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

Highland Telephone Cooperative's network also has IP-portions which originates calls via SIP connections to other carriers. Highland Telephone Cooperative has registered with the Policy Administrator and is an authorized service provider in the STIR|SHAKEN ecosystem. Highland Telephone Cooperative has implemented STIR|SHAKEN within the IP portions of its network and signs the calls originating on the IP portions of its network with the Highland Telephone Cooperative certificate.

Highland Telephone Cooperative has implemented the following Robocall Mitigation Program to detect and prevent unlawful robocalls from originating on its network.

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

Call Analytics

Highland Telephone Cooperative does not use a vendor for call analytics. Highland's soft switch monitors all originating calls processed through our network. All access lines are subject to a directory number usage report and is logged in our switch. This will allow Highland Telephone Cooperative to begin collecting data on normal call activity allowing suspicious activity and other anomalies to quickly be discovered on the network. Highland Telephone Cooperative serves a small community located in the Western portion of Highland County, Virginia with less than 1800 access lines. Having this small amount of access lines allows Highland Telephone Cooperative to quickly discover and eliminate the threat of unlawful robocalls originating on our network.

Highland Telephone Cooperative examines all directory number usage reports to confirm the originating calls are legitimate.

Enforcement

If it is determined a Highland Telephone Cooperative customer is originating prohibited unlawful robocalls on our network, Highland Telephone Cooperative will either warn the

customer to stop or terminate their service as allowed per Highland Telephone Cooperative's policy.

Know Your Customer

Highland Telephone Cooperative has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Highland Telephone Cooperative 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.

Upstream Provider Knowledge

Highland Telephone Cooperative knows all the carriers from which it receives traffic and has confirmed that all of the carriers are listed in the Robocall Mitigation Database. Highland Telephone Cooperative monitors incoming traffic from all connected carriers for suspicious call patterns indicative of illegal robocall activity, notifies the upstream carriers of any such traffic and warns the carriers that if the traffic does not cease, the calls may be blocked from entering Highland Telephone Cooperative's network. In addition, (Company Name) is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.

Traceback

Highland Telephone Cooperative is committed 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. Highland Telephone Cooperative commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within twenty-four (24) hours.