



Pembroke Telephone Company, Inc. (OCN 0376) and its subsidiary Pembroke Advanced Communications, Inc. d/b/a PACfiber 185 E. Bacon Street Pembroke, Georgia 31321

1. Identifying Information

Pembroke Telephone Company, Inc. ("Pembroke") is an Incumbent Local Exchange Carrier (ILEC) operating under OCN 0376. Its wholly owned subsidiary, Pembroke Advanced Communications, Inc. d/b/a PACfiber, operates as a competitive local exchange carrier. Pembroke is a privately held company, headquartered at 185 E. Bacon Street in Pembroke, Georgia.

Pembroke is a **small voice service provider**, serving fewer than 5,000 subscriber lines. Pembroke is not a foreign voice service provider and does not have any foreign ownership interests.

1.1 Point of Contact for Robocall Mitigation

John Hoskins

Network Manager

185 E. Bacon Street

Pembroke, GA 31321

(912) 653-4389

john.hoskins@pacfiber.com

This individual is designated to receive and respond to traceback requests, enforcement inquiries, and all matters related to robocall mitigation compliance.

1.2 Corporate Disclosures

Pembroke discloses its principals, affiliates, subsidiaries, and parent companies as follows:

- **Parent Company:** Pembroke Telephone Company, Inc.
- **Subsidiary:** Pembroke Advanced Communications, Inc. d/b/a PACfiber Pembroke has no additional affiliates or parent entities.

2. Role in the Call Chain

Pembroke acts as a local exchange carrier serving both residential and business customers in North Bryan County, Georgia. Pembroke provides direct voice services to its subscriber base, and it interconnects with other carriers through both TDM and SIP-based trunks.

- **TDM Connections:** Pembroke connects to the local tandem network using TDM trunks with AT&T.
- **SIP Connections:** Pembroke also exchanges traffic with other providers and customers over SIP.

Outbound SIP calls are authenticated using STIR/SHAKEN with a certificate owned and managed by Pembroke. Inbound calls are verified using STIR/SHAKEN. Pembroke uses **TransNexus ClearIP** as its SHAKEN software service provider to facilitate these functions.

When Pembroke receives calls without SHAKEN authentication information from other voice service providers, Pembroke treats those calls as an intermediate provider. In that case, Pembroke applies a **C-Level Attestation** to the call to ensure consistency and accountability in the call chain.

Pembroke does not provide any International service and plays no role in the call chain for calls entering the US from non-US locations.

3. STIR/SHAKEN Implementation

Pembroke has deployed STIR/SHAKEN for its SIP interconnections on the SIP portions of its network. Its implementation relies on TransNexus ClearIP for certificate management, PASSporT creation, and verification. Specifically, TransNexus provides:

- Generation of Pembroke's STI certificate and private key under the STI-CA framework.
- Secure storage of both public and private keys associated with Pembroke's STIR/SHAKEN deployment.
- Creation of PASSporTs for calls that Pembroke authenticates.
- Verification of PASSporTs on inbound calls.
- Logging of authentication and verification results for accountability.

All customers are permitted to make outbound calls only using telephone numbers that Pembroke has assigned to them. Exceptions are limited to SIP trunking customers forwarding calls; in those cases, Pembroke applies the proper **A- or B-Level attestation** depending on the circumstances.

Pembroke retains a copy of its contract with TransNexus for SHAKEN services and makes it available to the FCC upon request.

4. Measures to Prevent Illegal Robocalls

Pembroke employs several layers of protection designed to prevent illegal robocalls from originating or transiting its network.

4.1 Customer Call Origination Controls

- Pembroke's Metaswitch softswitch enforces strict controls, allowing customers to originate calls only from numbers assigned to them.
- Calls attempted with spoofed caller ID numbers or with numbers not associated with the customer are blocked automatically by the softswitch.
- These measures ensure that Pembroke customers cannot mask their identity or originate calls using fraudulent or unassigned numbers.

4.2 Know Your Customer (KYC) Procedures

Pembroke has operated in its community for over a century and maintains a close relationship with its customer base. As a small service provider, Pembroke benefits from direct knowledge of its subscribers.

Pembroke provides a direct authenticated relationship with its customers, through exchange of business information, contracts, and physical location at the business place of operations.

- Customer service representatives are trained to recognize and address unusual calling behavior.
- Pembroke monitors call logs and traffic statistics across both SIP and TDM trunks. If excessive short-duration or high-volume call patterns are detected, Pembroke investigates promptly.
- Customers determined to be originating suspicious traffic are contacted directly and required to provide justification or proof that calls are lawful.
- Lawful high-volume calling customers are documented and, where appropriate, required to sign special contracts clarifying their permitted use of services.
- Pembroke reserves the right to terminate service immediately for customers engaging in illegal robocalling.

4.3 Know Your Upstream (KYU) Procedures

Pembroke verifies that each upstream voice provider capable of sending traffic into the Pembroke network is properly listed in the FCC's Robocall Mitigation Database (RMD).

- Pembroke confirms the upstream provider's business name and OCN.
- Pembroke monitors for Commission notifications and removal notices concerning RMD compliance.
- If an upstream provider is determined to be non-compliant or the source of illegal robocalls, Pembroke contacts the provider and, if necessary, blocks traffic until compliance is restored.

4.4 Automated Analysis

Pembroke uses TransNexus ClearIP analytics to detect and flag potential violations and illegal calls. ClearIP provides SIP analytics based on high call rates, phone number reputation lookups, and detection of calls from high risk or do-not-originate (DNO) numbers. These analytics review all calls and report problems. This analysis is used only for alerting Pembroke staff and is not used for automated blocking.

5. Response to Traceback Requests

Pembroke recognizes traceback as a critical enforcement tool. The company is fully committed to cooperating with the FCC, law enforcement, and the Industry Traceback Group.

- Pembroke will respond to traceback requests **within 24 hours** of receipt.
- The designated point of contact (John Hoskins) manages and coordinates traceback responses.
- Pembroke uses its Metaswitch softswitch to trace calls back to their origin, whether a specific subscriber, trunk, or upstream provider. The switch records allow identification of subscriber accounts, trunk group members, and TCIC codes associated with other carriers.
- Pembroke will provide complete and accurate traceback information while ensuring compliance with other applicable legal obligations.

6. Blocking of Illegal Traffic

Pembroke is committed to actively blocking illegal traffic when notified by the Commission or when identified internally.

1. **Initial Investigation:** Upon notice from the FCC or other authority, Pembroke immediately investigates the flagged traffic using call logs, switch records, and customer inquiries.
2. **Lawful Call Verification:** If traffic is determined to be lawful (e.g., calls placed with documented prior express written consent), Pembroke provides the Commission with findings and supporting documentation.
3. **Customer-Originated Illegal Traffic:** If traffic originates from a Pembroke customer and is determined to be illegal, Pembroke takes immediate action, which may include:
 - Blocking outbound calls from the customer
 - Imposing account codes or other restrictions
 - Terminating service if mitigation is unsuccessful
4. **Upstream-Originated Illegal Traffic:** If traffic enters through an upstream provider, Pembroke contacts the provider to remediate the issue. If necessary, Pembroke blocks traffic from that provider until the illegal calls cease.

Pembroke will immediately block all traffic from providers removed from the RMD per FCC orders.

7. Ongoing Technology Review

Pembroke continually evaluates industry developments regarding the implementation of STIR/SHAKEN in TDM environments. Although STIR/SHAKEN is currently deployed in SIP, Pembroke will adopt FCC-approved TDM solutions when they become technically feasible and financially reasonable. Pembroke is also evaluating a gradual migration toward a fully SIP-based interconnection architecture to further strengthen its mitigation efforts.

8. Required Disclosures

- **STIR/SHAKEN Exemptions:** Pembroke does not claim any STIR/SHAKEN exemptions.
- **Law Enforcement Actions:** Neither Pembroke nor its affiliates have been subject to FCC or law enforcement actions, investigations, or sanctions within the past two years relating to robocalling, spoofing, or RMD certification deficiencies.
- **Certification:** Pembroke certifies that all calls originated on its network are subject to this Robocall Mitigation Plan, that no prior certifications have been removed by Commission action, and that no RMD filings have been prohibited.

9. Commitment Statement

Pembroke believes that preventing illegal robocalls is essential to protecting its customers and preserving trust in the communications ecosystem. Pembroke commits to:

- Employing technical safeguards, including STIR/SHAKEN and softswitch-based controls, to prevent illegal robocalls.
- Maintaining strong Know Your Customer and Know Your Upstream procedures to detect and address suspect traffic.
- Responding to traceback requests fully and within the mandated 24-hour window.
- Investigating and blocking illegal traffic promptly when notified by the Commission or other authorities.
- Monitoring technological advancements and adopting improved solutions when feasible.

Pembroke affirms that this Robocall Mitigation Plan satisfies the requirements of **DA 25-694 (August 6, 2025)** and will be kept current as Commission rules evolve.

Management and Ownership:

Company Name	Relationship to Filing Entity	% owned by Filing Entity	Management or Control of the entity
Pembroke Telephone Company, Inc.	Holding Company	100	Jeanne McCormick, President Maryanna Hite, Secretary/Treasurer CFO
Pembroke Advanced Communications, Inc. dba PACfiber	Subsidiary	100	Jeanne McCormick, President Maryanna Hite, Secretary/Treasurer CFO