

## **ST. JOHN TELEPHONE, INC. ROBOCALL MITIGATION PLAN**

St. John Telephone, Inc. (“St. John” or the “Company”) is an incumbent local exchange carrier with its headquarters located in E. 11 Front St., St John WA. 99171. This Robocall Mitigation Plan (the “Plan”) sets forth the ways the Company is meeting its obligation to take affirmative, effective measures to prevent new and renewing customers from originating illegal calls, as required by the Federal Communications Commission’s rules.

### **I. Definitions**

- A robocall is any call made using an “automatic telephone dialing system” or an artificial or prerecorded voice.
- An upstream provider is any provider from which the company directly receives traffic.

### **II. Know Your Customers**

- The identity of all subscribers is vetted via the application process to ensure valid use of telephone number resources.
- Caller ID information is verified, and subscribers are not granted the right to send non-trusted subscriber information.
- St. John does not sell services to international call originators.
- St. John does not sell services to subscribers outside of its physical service territory.
- All St. John subscribers are required to have a physical connection to its network.
- A customer can only originate calls from a number that identifies in our switch as a number that has been assigned to that customer.

### **III. Know Your Upstream Provider**

- The Company has confirmed that each upstream provider has a certification in the Robocall Mitigation Database.
- The Company does not accept voice traffic from an uncertified provider.
- The Company establishes an understanding of each upstream provider’s role in the call path (e.g., whether they are acting as an originating voice service provider, a foreign intermediate provider, or a U.S.-based intermediate provider.)

### **IV. STIR/SHAKEN Implementation**

- The Company has not implemented STIR/SHAKEN because its network is all non-IP and its facilities do not support STIR/SHAKEN.
- The Company is in the process of upgrading its network to support STIR/SHAKEN with Toly Digital and TransNexus.

## V. Traceback

- The Company responds to all traceback requests from the Commission, law enforcement, and the registered traceback consortium within 24 hours.
- The Company cooperates fully with such entities in investigating and stopping any illegal robocallers that use its service to originate, carry, or process illegal robocalls.

## VI. Monitoring

- St John runs weekly reports from their switch to observe for any excessive call volumes and other indicators of illegal robocalling.
- St John personnel investigate any callers that appear to be initiating illegal robocalls. In the event personnel determine illegal robocalling is likely to be occurring, additional measures that may be taken include: issuing a warning, contacting the FCC, and terminating the account, as appropriate.