

Scott County Telephone Company Robocall Mitigation Program

This Robocall Mitigation Plan describes the specific reasonable steps that Scott County Telephone Company (Scott County) has taken to avoid the origination, carrying, or processing of illegal robocall traffic on its network.

Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Robocalls

Scott County has a “know-your-customer” policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. Scott County’s business customers are very small businesses that are physically located in our service territory. Prior to a new business customer ever making a call on Scott County’s network, we personally know, or get to know, the business owners and/or management. This personal touch gives Scott County a clear view of whether the business is a risk for originating illegal robocalls.

Scott County has never received a request for high-volume origination services. However, were Scott County to ever receive such a request, we would exercise caution and extensively investigate the requesting entity prior to providing service. In particular, we would collect information such as their physical business location, contact person(s), state or country of incorporation, federal tax ID, and the general nature of their business.

“Know-Your-Upstream Provider” Procedures

Scott County has connections with only two upstream providers (CenturyLink and Brightspeed) and we know these providers very well. Before accepting traffic from any new upstream provider, Scott County would exercise due diligence and seek to ensure that the provider is not using Scott County to carry or process a high volume of illegal traffic. Specifically, Scott County would collect information such as the upstream provider’s physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of their business.

Use of Call Analytics Systems

Scott County uses a call analytics system provided by TransUnion/Neustar to monitor all outbound and inbound voice traffic in real time to prevent the origination and termination of illegal robocalls on its network. With regard to calls originating on Scott County’s network, the TransUnion/Neustar call analytics system monitors calling and traffic patterns consistent with illegal robocalls. This includes unusual spikes in traffic and calls where the calling phone number is invalid, unallocated, or on a Do Not Originate list. If the call analytics system detects a suspected robocalling pattern, or if Scott County has reason to suspect that illegal robocalling or spoofing is occurring on its network, the Company will take appropriate action, which may include suspending or terminating the subscriber.

In addition, the TransUnion/Neustar call analytics system is able to determine if a number terminating on Scott County’s network could be a robocall. This protects subscribers

from calls that come from networks that cannot authoritatively attest to the calling party. Scott County customers have the option of having these calls blocked.

Commitment to Respond to Traceback Requests

Scott County commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its services to originate, carry, or process illegal robocalls.