



NITCO
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Northwestern Indiana Telephone Company, Inc., DBA NITCO Robocall Mitigation Program

This Robocall Mitigation Plan describes the specific reasonable steps that Northwestern Indiana Telephone Company, Inc., DBA NITCO 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

NITCO has a “know-your-customer” policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. Prior to a new business customer ever making a call on NITCO’s network, we personally know, or get to know, the business owners and/or management. This personal touch gives NITCO a clear view of whether or not the business is a risk of originating illegal robocalls. Although NITCO’s business customers generally do not generate a high volume of calls, were the Company to receive a request for high-volume origination services, it would exercise caution and extensively investigate such customers before granting access to the services.

In addition, NITCO’s contracts with business customers contain provisions which allow for service termination in the instance that NITCO’s services are used for illegal purposes, such as illegal robocalling. NITCO would not hesitate to enforce these contract terms if its services were abused.

“Know-Your-Upstream Provider” Procedures

Most of the connections that NITCO has with upstream providers have been in place for many years, and we know these companies very well. However, NITCO exercises due diligence before accepting traffic from any new upstream provider as we seek to ensure that such providers are not using NITCO to carry or process a high volume of illegal traffic. Specifically, NITCO collects 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

NITCO has implemented the TransNexus Clear IP robocall monitoring solution. This product verifies that all outgoing calls pass a reputation test to ensure that the originating party has not been reported or flagged as a source of unwanted calls. ClearIP processes a file of customer usage with suspicious calling patterns every day. NITCO reviews this file every business day to



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check for numbers that are originating calls that are suspect. In review, NITCO verifies if the originating customer is using this auto dialer for legitimate reasons, such as a pharmacy, school or doctor's office. If a customer was found to be originating illegal and/or unwanted robocalls, calls from that originating number would be blocked.

Commitment to Respond to Traceback Requests

NITCO 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.