

Robocall Mitigation Plan – Nicholville Telco LLC.

Robocall Mitigation Compliance with TRACED Act

Date	On behalf of	Change Summary
11/22/2024	Nicholville Telco, LLC – OCN 0108	Revised 11/22/2024

Objective: Establish and follow a policy that is compliant with TRACED Act

Nicholville Telco, LLC. (NICHOLVILLE) is a small incumbent local exchange carrier with headquarters at 3330 State Highway 11B, Nicholville, NY 12965.

NICHOLVILLE performs the following role in the call chain:

- A voice service provider with a STIR/SHAKEN implementation servicing end users

NICHOLVILLE is a wholly owned subsidiary of SDC Atlas Acquisitionco LLC. NICHOLVILLE is managed by SLIC Network Solutions, Inc.

NICHOLVILLE has not been prohibited from filing a certification in the Robocall Mitigation Database.

NICHOLVILLE does not have a history of enforcement actions for illegal robocalls, TCPA or TSR violations, or related state law violations.

NICHOLVILLE uses the affirmative, effective measures described herein to prevent the origination or transit of illegal robocalls. All NICHOLVILLE traffic is subject to such mitigation.

I. Implementation and Extension Status

Extensions Received Under 47 C.F.R. §64.6304

NICHOLVILLE is eligible for the continuing extension of the STIR SHAKEN implementation deadline as a small voice service provider (§64.6304 (a)(2) that has non-IP portions within its network §64.6304(d).

NICHOLVILLE is a member of NTCA who participates on the ATIS Non-IP taskforce working group which developed the (ATIS Solutions) non-IP call authentication solutions and serves as NICHOLVILLE's third-party representative on the ATIS Non-IP taskforce working group.

Status of STIR/SHAKEN Implementation

NICHOLVILLE has registered with the STI-PA using OCN 193C. NICHOLVILLE has our own STIR/SHAKEN certificate issued by TransNexus STI-CA. NICHOLVILLE has implemented STIR/SHAKEN using an STI-AS and STI-VS supplied by TransNexus.

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The portion of NICHOLVILLE traffic that remains TDM is subject to its robocall mitigation plans.

II. General Prohibition Against Illegal Robocalling

NICHOLVILLE end user services are subject to restrictions pursuant to its Acceptable Use Policies and Terms of Service (“TOS”) requirements. NICHOLVILLE Acceptable Use Policies and TOS published on its website will be updated to reflect the illegality of robocalling including the prohibition against:

- Providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call
- Violating any applicable local, state, or federal law; using NICHOLVILLE service to engage in or in connection with fraudulent activities such as illegal robocalling.

In addition, NICHOLVILLE is updating its TOS to expressly reference the prohibition on robocalling and all current subscribers will receive notice of the publication of its updated TOS.

III. Robocalling Mitigation

Analytics

NICHOLVILLE utilizes ClearIP call analytics software by TransNexus, a third-party analytics vendor, to monitor all outbound voice traffic in real-time to prevent the origination or transit of illegal robocalls.

The software provides detailed reporting to identify suspected illegal robocalls. The system alerts us if NICHOLVILLE processes outbound calls where the calling number has a poor reputation or is invalid, unallocated, or on a Do Not Originate list.

NICHOLVILLE performs the same mitigation steps for all outbound calls regardless of our role in the call chain for a particular call.

NICHOLVILLE immediately investigates any identified suspicious calls to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls. If NICHOLVILLE determines that the traffic was likely unlawful, then NICHOLVILLE will warn them to stop sending such traffic. If they continue to send traffic that appears to be unlawful, then NICHOLVILLE terminate their service.

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IV. Know Your Customer

NICHOLVILLE follows the caller ID authentication best practices for vetting caller identity and operational legitimacy for new and existing customers as described by the NANC Call Authentication Trust Anchor Working Group.

NICHOLVILLE has a "know your-customer policy" to assist in preventing its voice services from being used to originate illegal robocall traffic. NICHOLVILLE identifies potential business customers prior to providing service by collecting information such as their physical business location, contact person(s), federal tax ID, and the general nature of their business. In addition:

- A NICHOLVILLE representative may visit the premise of a business to verify the number of users at the location is appropriate for the volume of outbound calls.
- NICHOLVILLE will not deploy large volume calling capability as a residential service or at an address shown in the company records as being residential.

NICHOLVILLE serves only a small number of long-time business customers which do not have any significant large volume calling capability thereby mitigating any potential illegal robocalling.

V. Know Your Upstream Provider

NICHOLVILLE has a vetting and review process for upstream providers, that is, providers that send us voice traffic that NICHOLVILLE terminates or transits to other providers.

NICHOLVILLE confirms that the upstream provider has a certification in the Robocall Mitigation Database. NICHOLVILLE will not accept voice traffic from an unregistered provider.

NICHOLVILLE requires that the upstream provider has a reasonable robocall mitigation plan, including a vetting process for its customers and upstream providers, and uses call analytics to identify suspicious traffic.

NICHOLVILLE establishes an understanding of the upstream provider's role in the call path for the traffic they will send to us, for example, whether they are acting as an originating voice service provider, a foreign intermediate provider, or a U.S.-based intermediate provider. We use this information to understand whether we will be obligated to authenticate unsigned traffic that we receive from them.

NICHOLVILLE contractual provisions with upstream providers prohibit them from sending us illegal robocalls. If NICHOLVILLE finds that an upstream provider is sending us suspicious robocalls, NICHOLVILLE will warn them to stop. If such traffic continues, then NICHOLVILLE will terminate their service.

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VI. Traceback and Enforcement Cooperation

NICHOLVILLE will actively participate with the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG). NICHOLVILLE commits to respond within 24 hours to all traceback requests from the Commission, law enforcement, and the ITG and will cooperate with such entities in investigating and stopping any illegal robocallers that use our services to originate calls.