

Confidential - Not for Public Use

Robocall Mitigation Plan Description for The Tri-County Telephone Association, Inc.

1. The Tri-County Telephone Association, Inc. is a Small Service Provider, serving fewer than 100,000 voice service subscriber lines and therefore qualifies for an extension of STIR SHAKEN Implementation under 47 C.F.R. §64.6304(a)(2)

To meet the non-IP network criteria for the continuing STIR SHAKEN extension (§64.6303 (a)(2)), Tri-County Telephone Association, Inc is a member of NTCA. NTCA participates on the ATIS Non-IP taskforce working group which developed the (ATIS Solutions) non-IP call authentication solutions. NTCA is serving as TCT's third party representative on the ATIS Non-IP taskforce working group.

Currently Tri-County Telephone does not have any SIP traffic originating or terminating on its network. If this changes Tri-County Telephone will implement a third party that adheres to the STIR/SHAKEN rules and regulations

2. The Tri-County Telephone Association, Inc. commits to respond to all trace back requests from the Commission, law enforcement, and industry trace back consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.
3. The Tri-County Telephone Association, Inc. has taken the following specific steps to detect originating robocall traffic:
 - a. Contracted with Meta Switch and using their Call Guardian Software that will mitigate the origination of robocalls based on a score card for numbers in the company's switch.
 - b. The company will be monitoring traffic patterns through our software reports for Robocalling. If robocalling is suspected the company will research if such calls are justifiable vs non justifiable by contacting customers and getting determination of use before restoring services
4. The Tri-County Telephone Association, Inc. has taken the following steps to mitigate illegal originating robocalling traffic upon detection:
 - a. TCT will notify customers of detection of illegal activity and multiple violations will result in service termination.