

East Buchanan Telephone Cooperative

Robocall Mitigation Plan

This Robocall Mitigation Plan is submitted by East Buchanan Telephone Cooperative pursuant to the provisions of 47 C.F.R. § 64.6305, adopted by the Federal Communications Commission (FCC) which require all “voice service providers” to establish a “robocall mitigation plan”. This document sets forth the Provider’s current policies and procedures designed to reduce or eliminate outbound illegal robocalls originating on its network. The Provider views these policies and procedures as constituting “reasonable steps” to avoid the origination of illegal robocalls on its network and in addition to following these steps the Provider commits to responding to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG), and to cooperate with such entities in investigating and stopping any illegal robocallers that may use its service to originate calls.

I. STIR-SHAKEN IMPLEMENTATION STATUS

As indicated in the FCC’s Robocall Mitigation Database, the Provider’s status with respect to STIR-SHAKEN implementation is as follows:

[REDACTED]

II. TRACEBACK REQUESTS

As noted above, the Provider will cooperate with the FCC, law enforcement and the ITG on all traceback requests and investigations. To allow for timely and comprehensive law enforcement response efforts against illegal robocallers, the Provider will dedicate sufficient resources to promptly complete and provide responses to all traceback requests received from the FCC, law enforcement and/or the ITG, and commits to fully responding to any traceback

request received within 24 hours after receiving the same. Within **Appendix A** to this Plan, the Provider identifies a single point of contact for receiving all traceback requests.

[REDACTED]

III. *CUSTOMER VETTING PRACTICES*

[REDACTED]

Further, with respect to meeting existing obligations to take affirmative, effective measures to prevent new and renewing customers from originating illegal calls, the Provider:

[REDACTED]

[REDACTED]

[REDACTED]

IV. TELEPHONE NUMBER VALIDATION PRACTICES

[REDACTED]

V. INTERNATIONAL CALL ORIGINATORS

The Provider is not currently an international voice services provider. If at any time the Provider does sell its services to customers which are international call originators using North American Numbering Plan resources it will familiarize itself with and develop best practices for fulling vetting such customers and performing telephone number validation on all international originated calls.

VI. KNOW YOUR UPSTREAM PROVIDER PROCEDURES

[REDACTED]

As a rural provider of voice services, the number of upstream providers used by the Provider to receive and deliver its originated voice calls for termination are somewhat limited. The Provider has longstanding relationships with these upstream providers and maintains its awareness of the nature of their businesses and the legitimacy of their call transmission services. Further, the Provider, in the interest of providing the highest quality services to all of its voice service customers, is committed to taking those steps necessary to ensure that any upstream providers providing connectivity are equally committed to monitoring their networks and preventing their use for the transmission of illegal robocalls. This includes the use of robocall prevention language in any contracts that the Provider may directly have with any upstream provider entities. Included as part of **Appendix A** to this Robocall Mitigation Plan document is a list of the Provider's current, immediate "Upstream Provider(s)" along with contact information for each.

VII. ONGOING ROBOCALL MITIGATION PRACTICES

[REDACTED]

[REDACTED]

[REDACTED]

VIII. THIRD-PARTY CALL ANALYTICS

The Provider also uses third-party call analytics to further assist and prevent the origination of illegal robocalls on its network. Included in **Appendix A** is the name of the vendor(s) used along with a description of the call analytics system(s) used to identify and block illegal robocall traffic.

Appendix A

Traceback Request Single Point of Contact:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Upstream Provider Information:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Call Analytics Vendor Name and Description of System:

PROCESS FOR ROBOCALL MITIGATION FOR EAST BUCHANAN TELEPHONE COOPERATIVE

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]