

ROBOCALL MITIGATION PROGRAM

Plateau Telecommunications, Incorporated

Status of STIR/SHAKEN Implementation

As of June 15, 2023, the voice traffic that originates or terminates on the network of Plateau is authenticated or verified with STIR/SHAKEN.

Specific Reasonable Steps Taken to Avoid Originating Illegal Robocall Traffic

This Robocall Mitigation Plan describes the specific measures that the Company has implemented to detect and prevent illegal robocalls on its network as of June 30, 2021. The Company will periodically evaluate the risks it faces, the effectiveness of its policies and procedures, and its capabilities to support the measures described. Should the company determine that changes are appropriate, its practices may differ from those described below.

- **Risk Assessment:** Plateau is a voice service provider offering a variety of voice calling services. Its customers generally do not originate high-volume calls and Plateau has not received information suggesting that robocalls are originated on its network. Therefore, Plateau does not consider its network at high risk of originating illegal robocalls.
- **Customer Due Diligence:** Plateau conducts due diligence on new and renewing customers. The Company confirms the customer's service address for all customers.
 - Plateau verifies customer information when contracts are renewed or services are added.
 - Plateau verifies its customers' identities.
 - Plateau is entitled, at its sole discretion, to suspend, terminate or change the Services without advance notice upon any misuse of the Services in any way.
 - Plateau has in place an acceptable use policy. Plateau also has in place policies designed to detect and prevent fraudulent traffic on its network.
 - Plateau uses TNS Call Guardian analytics technologies and services to monitor traffic on its network and identify potentially unlawful call origination activity. If Plateau has a reasonable basis to believe that a customer is originating illegal robocalls, it will require the customer to remedy the problem and, if effective action is not taken, Plateau can suspend and/or terminate service to the customer.
 - Plateau blocks the following types of calls by default:
 - Calls originating from invalid numbers per FCC Order [2017 Call Blocking Order]
 - Calls from DNO numbers as per FCC Order [2017 Call Blocking Order]
- **Responding to Traceback Requests**
 - Plateau has designated an individual as a dedicated point of contact for addressing traceback requests, and a backup person to that individual. It has provided the ITG with the contact information and business hours for those individuals or will do so

upon receipt of the first request from the ITG. See <https://www.ustelecom.org/the-industry-traceback-group-itg/for-providers/>

- Plateau will respond promptly to inquiries received from the Industry Traceback Group. If a pattern of questionable activity is detected, Plateau will require its customer to remedy the problem and, if effective action is not taken, service to the customer may be suspended and/or terminated.
- **Cooperation with State and Federal Regulators:** Plateau will cooperate with state and federal regulators to prevent any and all illegal robocalls. Specifically, Plateau will:
 - Commit to fully respond, 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 illegal robocallers that use its service to originate, carry, or process illegal robocalls.
 - Provide relevant non-proprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities; and
 - Implement mandated robocall mitigation procedures to the fullest extent possible with the goal of maximizing the mitigation of illegal robocalls.

Plateau has deployed call authentication, call labeling, and call blocking services provided by TNS. Plateau has made strides to protect its network and consumers from harmful calls. Plateau is pleased to play a role in that improvement and will continue the necessary work to protect its customers.

- **Principals, Affiliates, Subsidiaries and Parent Companies:** Plateau Telecommunications, Incorporated is a wholly-owned subsidiary of its parent company ENMR Telephone Cooperative. Its structure consists of a member-elected Board of Directors who hire a Chief Executive Officer to oversee the day-today operations.