

## ROBOCALL MITIGATION PROGRAM

### ENMR Telephone Cooperative

#### Type of Extensions Received Under 47 C.F.R. §64.6304

ENMR Telephone Cooperative (ENMR) has received the following types of extensions of the STIR/SHAKEN implementation deadline under §64.6304 of the FCC's rules: (1) the small voice service providers extension (§64.6304(a)), and (2) the non-IP networks extension (§64.6304(d)).

#### Status of STIR/SHAKEN Implementation

As of June 15, 2023, the voice traffic that originates or terminates on the network of ENMR is authenticated or verified with STIR/SHAKEN. ENMR had received a small voice service provider's extension under §64.6304(a) of the FCC's rules, which provided the company with a two-year extension of the STIR/SHAKEN implementation deadline, until June 30, 2023. ENMR had also received a non-IP networks extension under §64.6304(d) of the FCC's rules, which provided the company with a continuing extension of the STIR/SHAKEN implementation deadline for those portions of the company's network that cannot initiate, maintain, and terminate SIP calls. On June 15, 2023, ENMR was authenticating and verifying with STIR/SHAKEN voice traffic that originates and terminates on the IP portions of the company's network that support SIP calls. In addition, ENMR providers implemented a call authentication protocol for voice calls delivered over the non-IP portions of its network that do not use SIP technology when such a protocol is fully developed and finalized by industry standards and the necessary equipment and software is available on the commercial market."

#### 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:** ENMR is a voice service provider offering a variety of voice calling services. Its customers generally do not originate high volume calls and ENMR has not received information suggesting that robocalls are originated on its network. Therefore, ENMR does not consider its network at high risk of originating illegal robocalls.
- **Customer Due Diligence:** ENMR conducts due diligence on new and renewing customers. The Company confirms the customer's service address for all customers.
  - ENMR verifies customer information when contracts are renewed or services are added.
  - ENMR verifies its customers' identities.

- ENMR 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.
- ENMR has in place an acceptable use policy. ENMR also has in place policies designed to detect and prevent fraudulent traffic on its network.
- ENMR uses TNS Call Guardian analytics technologies and services to monitor traffic on its network and identify potentially unlawful call origination activity. If ENMR 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, ENMR can suspend and/or terminate service to the customer.
- ENMR 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**
  - ENMR 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/>
  - ENMR will respond promptly to inquiries received from the Industry Traceback Group. If a pattern of questionable activity is detected, ENMR 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:** ENMR will cooperate with state and federal regulators to prevent any and all illegal robocalls. Specifically, ENMR will:
  - Respond to valid law enforcement requests within 24 hours.
  - 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.

ENMR commits to fully respond

ENMR has deployed call authentication, call labeling, and call blocking services provided by TNS. ENMR has made strides to protect its network and consumers from harmful calls. ENMR 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:** ENMR is a member-owned telephone cooperative and the parent company of Plateau Telecommunications, Incorporated. Its structure consists of a member-elected Board of Directors who hire a Chief Executive Officer to oversee the day-to-day operations.