



Tenino Telephone Company's Robocall Mitigation Program

Tenino Telephone Company (the "Company") is a "small voice service provider," as that term is defined in Section 64.6304(a)(2) of the rules of the Federal Communications Commission ("Commission").

Company Network

The Company's operating network relies entirely on technology that cannot initiate, maintain, carry, process and terminate SIP calls. Accordingly, the Company has a continuing extension pursuant to Section 64.6304(d) of the Commission's rules.

The Company has implemented, and continues to observe, the following steps to mitigate and avoid illegal robocall traffic originating from its voice service network:

- The identity of all subscribers to the Company's originating voice services is vetted via the Company's application process to ensure valid use of telephone number resources.
- Caller ID information is verified and subscribers are not granted the right to send nontrusted subscriber information.
- The Company does not sell originating services to international call originators.
- The Company does not sell voice services to subscribers outside of its physical service territory, other than to end user subscribers for service to which the Company directly assigns telephone numbers.
- The Company does not offer high volume origination voice services.
- All of the Company's originating voice services are required to have a physical connection to the Company's network. A customer using such service to originate calls can do so only from a telephone number that identifies in the Company's switch as a number that has been assigned by the Company to that service.
- The Company monitors originating voice service traffic to ensure that it is valid.
 - The Company has installed a Nex-Tech/Cordell ISD4000 that monitors the Company's voice network for excessive call volumes and repeated calls and will alert Company personnel daily if any such calling is found.
 - The Company's personnel will investigate any callers that appear to be initiating illegal robocalls on the Company's network. If, after investigation, the caller is found to be placing illegal robocalls, the Company will take measures to block that caller's ability to place illegal robocalls.

In addition to the foregoing, the Company has implemented, and continues to observe, the following:

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Tenino Telephone Company

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Know Your Customer

The Company has two principal classes of customers for services subject to the Commission's robocall mitigation rules set forth in Sections 64.6301 through 64.6308 of the Commission's rules: (i) retail, end user, voice service customers for exchange services; and (ii) switched access services customers. The Company has "know your customer" programs for each of those two classes of customers. That program for retail, end user, voice service customers consists of the practices more fully described above in the first bulleted item. The "know your customer" program for access services customers includes the practices described below under the heading "Know Your Upstream Provider."

Know Your Upstream Provider

The Company has implemented a "know your upstream provider" program with respect to the Company's immediate upstream providers of services subject to the Commission's robocall mitigation rules set forth in Sections 64.6301 through 64.6308 of the Commission's rules. These upstream providers generally fall into one or more of three categories: (i) incumbent local exchange carriers whose switches in the public switched network are either directly subtended by the Company's switch(es) or otherwise connected by direct trunks to the Company's switch(es); (ii) interexchange carriers whose switches are connected to the Company's switch(es) by direct trunks; and (iii) non-incumbent local exchange carriers and wireless carriers that exchange local traffic with the Company by way of direct trunk groups by which their switches are connected to the Company's switch(es). To the extent feasible, the following information is collected, ascertained from one or more third-party sources, verified and/or confirmed with respect each carrier in any of those categories of providers: carrier name, carrier physical business address and/or other physical location identifier, contact person(s), state or country of incorporation or other legal formation and the provider's listing and certification in the Robocall Mitigation Database.

Contract and Tariff Provisions

The Company's services to end user customers and switched access service customers are subject to applicable tariffs, while the Company's interconnection and traffic exchange with non-incumbent local exchange carriers and wireless carriers, to the extent known to the Company, is subject to carrier-specific agreement. The Company's tariffs prohibit unlawful or abusive use of its services.¹ The Company's interconnection and traffic exchange agreements similarly prohibit use of the Company's services for unlawful purposes and/or require compliance with all

¹ The Company is an issuing carrier of National Exchange Carrier Association Tariff FCC No. 5. Section 2.2.2 of that tariff prohibits use of service furnished pursuant to that tariff for an unlawful purpose or in an abusive manner, and Section 2.1.8 of that tariff provides for termination, under certain circumstances, of services furnished pursuant to that tariff in the event of such unlawful or abusive use. The Company's local exchange service tariff(s) provide for discontinuance of service in accordance with WAC 480-120-172, which includes, as cause for discontinuance of service, "[u]nlawfully using service or using service for unlawful purposes."



applicable federal, state and local laws, ordinances, rules and regulations applicable to the parties' performance thereunder, and its agreement(s) for interconnection and exchange of traffic entered into since commencement of the Commission's Robocall Mitigation Database include one or more provisions, if consent thereto by the non-Company party to such agreement can be obtained, specifically addressing robocall traffic and obligating the non-Company party to comply with the Commission's robocall-related requirements insofar as applicable to the subject matter of the agreement.

Commitment

In its capacity as a provider of "voice service," as that term is defined in Section 64.6300(n) of the Commission's rules, the Company is committed to responding within 24 hours to all lawful traceback requests from the Commission, law enforcement, and the industry traceback consortium, and, to the extent permitted by law, to cooperating with such entities in investigating and stopping the origination on the Company's voice services network of illegal robocalls by any illegal robocallers that use any of the Company's services as a voice service provider to originate illegal robocalls.

Do Not Originate List

The Company has implemented a Do Not Originate List.



Principals, Affiliates, Subsidiaries, and Parent Companies

Shareholders

C Peterson Credit Shelter Trust
C Peterson Family Trust One
Stefanie S. Peterson
Charlie Ann Letts
Dana K. Thummel
Nickee L. Watson
Dennis N. Peterson

Officers

Chairman of the Board	Patricia A. Peterson
President	Steve Hanson
Vice President	Stefanie S. Peterson
Vice President	Dennis N. Peterson
Treasurer	Dana K. Thummel
Secretary	Nickee L. Watson
Chief Financial Officer	Rick Vitzthum

Parent

Scatter Creek Ltd

Affiliates

Kalama Telephone Company
Scatter Creek InfoNet
TenKal Company, DBA Scatter Creek Communications

Indirect Affiliates

Acme Cattle Company
Temporary Fencing of Washington

Dated: December 22, 2025