

Industry Telephone Company Robocall Mitigation Plan

Industry Telephone Company (Industry) is a small/rural carrier eligible for the STIR SHAKEN extension granted to small voice service providers with fewer than 100,000 voice subscriber lines under 47 CFR § 64.6304. Industry provides local service to fewer than 100,000 voice subscriber lines. The majority of customers are served on the non-IP portions of Industry's network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls. Industry's non-IP network is connected to carriers that do not support IP connectivity; therefore, Industry cannot upgrade the Non-IP connections to IP connectivity.

Industry has implemented the following Robocall Mitigation Plan to detect and prevent unlawful robocalls from originating on its network.

All calls that originate on Industry's network are subject to the described robocall mitigation plan.

Call Analytics

Industry has contracted with Ribbon to provide robocall analytics and reputation scoring of our network's outbound traffic. Ribbon's analytics identify patterns of suspected illegal robocalls and scores the calls based on their behavior and/or their status as suspected robocalls as reported to the Federal Communications Commission (FCC), Federal Trade Commission (FTC), and as reported by other carriers.

Industry has access to Ribbon's portal and receives notifications about telephone numbers originating suspected illegal robocalls on its network, including from unassigned, inactive and do-not-originate TNs. Industry also receives reports via e-mail alerts if any of its numbers experience a change in reputation such as suspicious traffic patterns or other detected anomalies outside the normal behaviour of our company's traffic. Industry will examine the reports and investigate and identify the source of the calls as unlawful or legitimate.

Enforcement

If it is determined an Industry customer is originating prohibited unlawful robocalls on our network, Industry will either warn the customer to stop or terminate their service as allowed per Industry's policy.

Upstream Provider Knowledge

Industry knows all the carriers from which it receives traffic and has confirmed that all of the carriers are listed in the Robocall Mitigation Database. Industry monitors incoming traffic from all connected carriers for suspicious call patterns indicative of illegal robocall activity. The connected carriers are made aware of any suspicious or illegal traffic identified and are notified that if the traffic does not cease, the calls may be blocked from entering Industry's network. No provider is using Industry's network to carry or process a high volume of illegal traffic. In addition, Industry is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.

Traceback

Industry is committed to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to

originate calls. Industry commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within twenty-four (24) hours.

Know your Customer

Industry has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Industry thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services.

Principals, Affiliates, Subsidiaries, and Parent Companies

Industry Communications, Inc. is the holding company of Industry Telephone Company. Industry Communications owns 100% of Industry Telephone Company and Industry I-Net, Inc.

Industry Communications, Inc. is owned by 6 family members.

Robin Marke	51.00%
Sheila Raeke	16.34%
Larry Ackley	16.34%
Nicholas Ackley	5.44%
Allison Ackley O'Briant	5.44%
Christopher Ackley	5.44%

Management & Control of each Entity:

Industry Communications, Inc.

President:	Robin Marek
Vice President:	Sheila Raeke
Treasurer/Secretary:	Karen Raeke

Industry Telephone Company

President:	Robin Marek
Vice President:	Shiela Raeke
Treasurer/Secretary:	Karen Raeke

Industry I-Net, Inc.

President:	Robin Marek
Vice President:	Shelia Raeke
Treasurer/Secretary:	Rachel Kozel

Industry I-Net, Inc. is a sister company to Industry Telephone Company. Industry I-Net has its own set of books and Board of Directors.