



Robocall Mitigation Program

04.10.2024

This Robocall Mitigation Plan describes the specific reasonable steps that Blanca Telephone Company (dba Blanca Networks, hereafter referred to as "Blanca") has taken to avoid the origination, carrying, or processing of illegal robocall traffic on its network.

Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Robocalls

Blanca has a "know-your-customer" policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. Blanca's business customers are small businesses that are physically located in our service territory. Prior to a new business customer ever making a call on Blanca's network, we personally know, or get to know, the business owners and/or management. This personal touch gives Blanca a clear view of whether the business is a risk for originating illegal robocalls.

Blanca has never received a request for high-volume origination services. However, were Blanca to ever receive such a request, we would exercise caution and extensively investigate the requesting entity prior to providing service. In particular, we would collect information such as their physical business location, contact person(s), state or country of incorporation, federal tax ID, and the general nature of their business.

"Know-Your-Upstream Provider" Procedures

Currently, the only upstream provider from which Blanca receives traffic is CenturyLink. Blanca's connection with CenturyLink has been in place for many years, and we know this provider very well. Before accepting traffic from any new upstream provider, Blanca would

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exercise due diligence and seek to ensure that the provider is not using Blanca to carry or process a high volume of illegal traffic. Specifically, Blanca would collect information such as the upstream provider's physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of their business.

Use of Call Analytics Systems

Blanca does not presently use any call analytics systems to identify and block illegal robocall traffic.

Commitment to Respond to Traceback Requests

Blanca commits to respond fully, 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 any illegal robocallers that use its services to originate, carry, or process illegal robocalls.

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