

**STIR/SHAKEN OVERVIEW & ROBOCALL MITIGATION PLAN**  
**FOR ARMSTRONG TELEPHONE COMPANY – MD**  
**FCC REGISTRATION NUMBER – 0004379707**

Pursuant to the rules adopted in the Sixth Caller ID Authentication Report and Order, Armstrong Telephone Company – MD (Armstrong) provides the following for continued compliance with STIR/SHAKEN and certification in the Robocall Mitigation Database.

**STIR/SHAKEN Overview**

Armstrong certification filing: Option 1 – Complete STIR/SHAKEN Implementation – Performing Robocall Mitigation.

STIR/SHAKEN was implemented on all IP portions of the network back in June 2021.

Armstrong certifies that all calls originating on our network are subject to the Robocall Mitigation Plan detailed below.

Armstrong certifies that any prior certification has not been removed by the Commission action.

**Traceback Requests**

Armstrong commits to respond to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG).

In the few instances that arose, Armstrong has provided documentation to the ITG within 24 hours to support those requests.

Armstrong will continue to respond fully in a timely fashion to inquiries received from the groups above. The designated point of contact for traceback requests will be the Regulatory – Traffic Management Group. All requests should be sent to [ARMTraceBack@agoc.com](mailto:ARMTraceBack@agoc.com).

**Robocall Mitigation Plan**

Armstrong uses a Mediation platform to create daily reports to review exceeded thresholds on TN Level for Call Volumes, Answered to Total Call Ratios and Average Call Durations.

Armstrong has contracted with a 3<sup>rd</sup> party vendor to utilize a Vetting process on customer numbers to verify the identity of the caller and confirm ownership of the number.

Armstrong subscribers must comply with the company Acceptable Use Policy prohibiting illegal use, fraudulent activity, auto-dialers, etc. Any violations may result in suspension or termination of service.

Armstrong has restrictions for all Residential and Business Customers that calls can only originate from a number identified in our switch that has been assigned to that customer. Any other number would block the call. Any Business PRI/PBX customer with Non-Armstrong numbers must provide a list of numbers that are associated with that customer and only those numbers will be permitted to originate calls.

Know Your Customer - Armstrong will screen any new customers requesting an excessive amount of call paths for legitimacy and continue to monitor existing customers using the analytical tools and processes detailed above. Additional reviews and investigations will take place for any customers with high-volume originations.