

Mountain View Telephone Company

FRN: 0001730944

Robocall Mitigation Plan

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Specific Reasonable Steps Taken to Avoid Originating Illegal Robocall Traffic

What follows are the specific reasonable steps MOUNTAIN VIEW TELEPHONE COMPANY has taken to avoid originating illegal robocall traffic. A Robocall is an unsolicited call from an auto-dialer that delivers a prerecorded voice message.

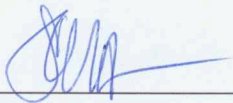
- 1) Know our customers
 - a) MOUNTAIN VIEW TELEPHONE COMPANY has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. MOUNTAIN VIEW TELEPHONE COMPANY thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services. In addition, MOUNTAIN VIEW TELEPHONE COMPANY will extensively investigate any new customers that seek access to high-volume origination services, to ensure that they are not abused by bad actors.
- 2) Call analytics to identify and block illegal robocall traffic
 - a) Call blocking and filtering analytics from the TNS Call Guardian product are utilized to protect subscribers from unwanted calls, whether they be robocalls, spam, nuisance, fraudulent calls, political campaigns, charities, telemarketers, etc.
- 3) Know our upstream providers
 - a) MOUNTAIN VIEW TELEPHONE COMPANY exercises due diligence before accepting traffic from an upstream provider. Specifically, we 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.
- 4) Stir/Shaken
 - a) As of this filing, MOUNTAIN VIEW TELEPHONE COMPANY has implemented STIR/SHAKEN on the IP portions of its network, and has been authenticating or verifying caller ID information for SIP calls that originate and terminate on those portions of the network. MOUNTAIN VIEW TELEPHONE COMPANY still has portions of its network that are non-IP (TDM), and cannot support STIR/SHAKEN. We will implement a call authentication protocol for voice calls delivered over the non-IP (TDM) portions of its network when such a protocol has been fully developed and finalized by industry standards and the necessary equipment and software is available on the commercial market.

5) Commitment to traceback requests

- a) MOUNTAIN VIEW TELEPHONE COMPANY 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 illegal robocallers that use its services to originate, carry, or process illegal robocalls.

6) Monitoring

- a) We have access to a cloud based monitoring system that records TN reputation. Reports are available on a per TN basis or company as a whole.



Sara Zimmerman, President

MOUNTAIN VIEW TELEPHONE COMPANY