

Sandhill Telephone Robocall Mitigation Plan

Sandhill Telephone Cooperative Inc. 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. Sandhill Telephone Cooperative Inc. has **12089** voice subscriber lines.

Sandhill Telephone Cooperative Inc. has implemented the following Robocall Mitigation Plan to detect and prevent unlawful robocalls from originating on its network.

All calls that originate on Sandhill Telephone Cooperative's network are subject to the described robocall mitigation program.

Robocall Mitigation Plan

Sandhill Telephone Cooperative Inc. has contracted with a vendor (Trans Nexus) to provide robocall analytics and reputation scoring of our network's outbound traffic. The vendor'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. Sandhill Telephone Cooperative Inc. has access to the vendor's portal and receives notifications about telephone numbers originating suspected illegal robocalls on its network, including from unassigned, inactive and do-not-originate TNs. Sandhill Telephone Cooperative Inc. also receive 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. Sandhill Telephone Cooperative Inc. will examine the reports and investigate and identify the source of the calls as unlawful or legitimate.

Traceback

Sandhill Telephone Cooperative Inc. 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.

Customer Vetting

Sandhill Telephone Cooperative Inc. has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Sandhill Telephone Cooperative Inc. 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.

Enforcement

If it is determined a Sandhill Telephone Cooperative Inc. customer is originating prohibited unlawful robocalls on our network, Sandhill Telephone Cooperative Inc. will either warn the customer to stop or terminate their service as allowed per Sandhill Telephone Cooperative Inc's policies that define the circumstances by which Sandhill Telephone Cooperative Inc. will suspend or terminate service to a customer. The policies can be viewed here: **www.mysandhill.com**.

Customer Education

Sandhill Telephone Cooperative Inc. posts information on its website to educate customers on how to protect themselves from becoming a victim of unlawful robocallers and a process to report complaints related to robocall activity. **www.mysandhill.com**.