



AFFILIATED
COMPANIES



Robocall Mitigation Plan Description for Alhambra-Grantfork Telephone Company

STIR/SHAKEN Extensions:

Alhambra-Grantfork Telephone Company has received the following extension of the STIR/SHAKEN implementation deadline under §64.6304 of the FCC's rules:

- (1) the non-IP networks extension (§64.6304(d)).

All originating calls on the Alhambra-Grantfork Telephone Company network are subject to the Robocall Mitigation Program measures described below.

Trace Back Requests:

Alhambra-Grantfork Telephone Company commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that are discovered using our service to originate calls, within 24 hours.

Robocall Mitigation Measures:

- 1) Alhambra-Grantfork Telephone Company has updated portions of the network to generate originating calls over SIP trunks. With these trunks, the originating calls can be monitored for excessive call volumes and measures are in place with our toll provider to screen for illegal robocalls generated by our long-distance customers.
- 2) Alhambra-Grantfork Telephone Company has worked with our billing vendor to establish monitoring of originating call volumes by our customer base. Originating call records are summarized and compared to previous volumes to check for large increases in call volumes that appear unreasonable. If such volume changes are discovered, the company will investigate the change and take appropriate action with the customer.
- 3) Alhambra-Grantfork Telephone Company has the capability to monitor originating call volumes by customer line, and we have implemented a call volume trigger if originating call volumes for particular customer's line break a certain threshold during the course of a monitoring period.

Status of Alhambra-Grantfork Telephone Company STIR/SHAKEN Implementation:

As of February 15, 2024, most of the voice traffic that originates or terminates on the network of Alhambra-Grantfork Telephone Company is authenticated or verified with STIR/SHAKEN.

Alhambra-Grantfork Telephone Company has also received a non-IP networks extension under §64.6304(d) of the FCC's rules, which provides the company with a continuing extension of the STIR/SHAKEN implementation deadline for those portions of its network that cannot initiate, maintain, and terminate SIP calls. As of June 30, 2023, Alhambra-Grantfork Telephone Company is authenticating and verifying with STIR/SHAKEN voice traffic that originates and terminates on the IP portions of the company's network that support SIP calls.

In addition, Alhambra-Grantfork Telephone Company will implement a call authentication protocol for voice calls delivered over the non-IP portions of its network that do not use SIP technology when such a protocol is fully developed and finalized by industry standards and the necessary equipment and software is available on the commercial market.

Alhambra-Grantfork Telephone Company has the following affiliates:

Alhambra-Grantfork Communications, Inc.
A-G NetworX, Inc.
Allpoint NetworX, Inc.
Alhambra-Grantfork Cellular Telephone Co., Inc.

Company Information on Principals, Affiliates, Subsidiaries:

Alhambra-Grantfork Telephone Company has a holding company affiliate, Alhambra-Grantfork Communications, Inc. The company also has a resale toll affiliate, A-G NetworX, Inc. an internet service provider affiliate, Allpoint NetworX, Inc., and a cellular investment affiliate, Alhambra-Grantfork Cellular Telephone Co., Inc. All of the affiliate companies are wholly-owned by the holding company Alhambra-Grantfork Communications, Inc. There is no principal or individual who owns a controlling interest Alhambra-Grantfork Communications, Inc., or who has control over the company operations.

The company officers are primarily responsible for the business operation and management of the company. The company officers are the following individuals:

President – Delmar Korsmeyer
Vice-President – Jed Schlechte
Secretary – Lawrence Henschen

Third Party Vendors used in call analytics:

The company does not utilize any third parties for call analytics at this point in time. At any point where the company employs a third party for the purpose of a call analytics application, the company will file a timely update to this plan document in the Robocall Mitigation Database.

Know Your Customer issues:

The company has know-your-customer procedures in place to prevent the abuse of the network related to illegal calls before they occur. The company requires customers to provide information on the physical location for service and a contact person for each service that is provisioned. The company also has documentation regarding acceptable use of service and the prohibition of the use of service for any fraudulent activities. The company has the right to suspend service or terminate service for any customer violation of the service terms.

Company Role in call chain:

Alhambra-Grantfork Telephone Company has the call chain role of being a voice service provider with a STIR/SHAKEN implementation obligation serving end users.

Alhambra-Grantfork Telephone Company Primary Contact Information for Robocall related issues:

Name: Tracey Robinson, General Manager

Phone Number: 618-488-2165

Email Address: genmgr@exchange.agtelco.com