

CITIZENS TELEPHONE COMPANY ROBOCALL MITIGATION PLAN

Citizens Telephone Company, Operating Company Number 0473 is eligible for the continuing extension of the STIR SHAKEN implementation deadline as a small voice service provider (§64.6304 (a)(2) that has non-IP portions within its network §64.6304(d).

Citizens Telephone Company provides local service to fewer than 100,000 voice subscriber lines. The majority of customers are served on the non-IP portions of the network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

To meet the non-IP network criteria for the continuing STIR/SHAKEN extension (§64.6303 (a)(2)), Comporium (inclusive of its affiliates and subsidiaries) is a member of NTCA. NTCA participates on the ATIS PTSC Non-IP Call Authentication Task Force working group which developed the (ATIS Solution) non-IP call authentication solutions. NTCA is serving as Comporium's third-party representative on the ATIS PTSC Non-IP Call Authentication Task Force working group.

Citizens Telephone Company also originates calls via SIP connections within its network. Citizens Telephone Company has registered with the Policy Administrator (via its parent company Comporium, Inc.) and is an authorized service provider in the STIR|SHAKEN ecosystem. Citizens Telephone Company has implemented STIR|SHAKEN within its IP-network and signs the calls originating on the IP portions of Citizens Telephone Company's network with its certificate.

Robocall Mitigation Plan

All voice traffic that originates on Citizens Telephone Company's network is subject to the following Robocall Mitigation Plan.

Call Analytics

Citizens Telephone Company has contracted with Ribbon Communications 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. Citizens Telephone Company, 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. Citizens Telephone Company, Inc. also receives reports if any of its numbers experience a change in reputation such as suspicious traffic patterns or other detected anomalies outside the normal behavior of our company's traffic. Citizens Telephone Company, Inc. will examine the reports and investigate and identify the source of the calls as unlawful or legitimate.

Investigation

Citizens Telephone Company promptly investigates calls identified as potential illegal robocalls or those that have abnormal call volumes, patterns, or activity consistent with illegal robocalls.

In addition, if Citizens Telephone Company has any other reason to suspect illegal robocalling or spoofing is taking place over its network, Citizens Telephone Company will work internally to identify the party that is using our network to originate, route, or terminate such calls and take appropriate action.

Enforcement

Illegal robocalls and fraudulent spoofing is prohibited on our network. If it is determined a Citizens Telephone Company customer is using our network to fraudulently spoof calls or to originate illegal robocalls, Citizens Telephone Company will immediately mitigate the illegal robocall traffic by either warning the customer to stop such practices or terminating their service as allowed per Citizens Telephone Company policy.

All Citizens Telephone Company customers receive notice of our company's prohibited use of its network for the initiation of fraudulent spoofing and robocalls. If the customer is found in violate of the prohibited use terms, their service may be terminated.

Know your Customer

Citizens Telephone Company has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Citizens 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.

Upstream Provider Knowledge

Citizens Telephone Company knows all the carriers from which it receives traffic and has confirmed that all of the carriers are listed in the Robocall Mitigation Database. Citizens Telephone Company has also reviewed the connected carrier's RMPs to learn how the carriers monitor their originating traffic to mitigate illegal robocalls. In addition, Citizens Telephone Company is now incorporating traceback and prohibited traffic language in all contractual agreements with upstream carriers. Citizens Telephone Company has also contracted with Ribbon Communications for terminating robocall mitigation.

Role In the Call Chain

Citizens Telephone Company is a voice service provider with a STIR/SHAKEN implementation obligation on the IP-Portions of its network. Citizens Telephone Company is also a voice service provider without a STIR/SHAKEN obligation on the non-IP portions of its network because that portion of the network relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

Traceback

Citizens Telephone Company commits 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. Citizens Telephone Company will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium fully and in a timely manner and within twenty-four (24) hours upon the effective date of the Commission's timeline traceback rules.

Robocall Mitigation Database Eligibility

Citizens Telephone Company has not been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling.

Citizens Telephone Company has not been prohibited from filing in the Robocall Mitigation Database (RMD).

Principles, Affiliates, Subsidiaries, and Parent Companies

David Barnes is the President and CEO of Citizens Telephone Company. David Barnes has managing control of Citizens Telephone Company and its affiliates and subsidiaries. Below are the Parent and/or subsidiaries and affiliates of Citizens Telephone Company.

FILING ENTITY: CITIZENS TELEPHONE COMPANY			
<u>Legal Name</u>	<u>Relationship to Filing Entity</u>	<u>Percentage Owned by Comporium</u>	<u>Management/Control of Entity</u>
Fort Mill Telephone Company	Subsidiary	100.00%	David Barnes
PBT Telecom, Inc.	Subsidiary	100.00%	David Barnes
PBT Communications, Inc.	Subsidiary	100.00%	David Barnes
Comporium, Inc.	Parent	100.00%	David Barnes
Lancaster Telephone Company	Affiliated	95.52%	David Barnes
Chesnee Telephone Company	Subsidiary	100.00%	David Barnes
Springboard, LLC	Related/Separately Owned	0.00%	David Barnes