

GEORGETOWN TELEPHONE COMPANY, INC ROBOCALL MITIGATION PLAN

Georgetown Telephone Company, Inc, (Georgetown) Operating Company Number 0456, 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)).

Georgetown's network is 100% non-IP. Georgetown provides local service to fewer than 100,000 voice subscriber lines.

All customers are served on Georgetown's non-IP network which relies on technology that cannot initiate, maintain, carry, process, or terminate SIP calls.

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

Robocall Mitigation Plan

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

Georgetown does not use a call analytics vendor.

Georgetown monitors all originating network traffic call detail records for suspicious or abnormal call pattern, volume, or activity. Calls that meet the below qualifying factors are investigated internally to determine if the calls are legitimate or unlawful:

- High-volume voice network traffic
- Large bursts of calls in a short timeframe
- Short duration calls
 - Low average call duration
 - Low call completion ratios
 - Sequential dialing patterns

Georgetown retains the originating and terminating call detail usage records for a minimum of six months.

Investigation

Georgetown investigates calls identified by internal traffic monitoring as suspicious calls or those that have abnormal call volumes, patterns, or activity consistent with illegal robocalls.

As of this filing, Georgetown has not had any originating robocalls detected in its network by the internal analytics. Georgetown also has not received any robocall complaints from end users.

In addition, if Georgetown has any other reason to suspect illegal robocalling or spoofing is taking place over its network, Georgetown 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 Georgetown customer is using our network to fraudulently spoof calls or to originate illegal robocalls, Georgetown will either warn the customer to stop such practices or terminate their service as allowed per Georgetown policy.

Know Your Customer

Georgetown has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Georgetown vets all new customers, business and residential, to validate their identity, physical location and contact person information. Georgetown also asks personally identifiable questions for additional security on each account before activating new service or making changes to existing services.

Contractual Provisions with End-users to Alleviate Robocalls

All new customers acknowledge a statement on the service application which states users of Georgetown's voice service are prohibited from originating unwanted calls – including illegal and spoofed robocalls- with the intent to defraud, cause harm, or wrongly obtain anything of value from the called party. If end users are found in violate of the Georgetown robocall mitigation policy, the end user's service may be terminated.

Know your Upstream Providers

Georgetown has confirmed that all carriers in which Georgetown exchanges traffic are listed in the Robocall Mitigation Database.

Georgetown has reviewed the connected carrier's RMPs to learn how the carriers monitor their originating traffic to mitigation illegal robocalls.

Traceback

Georgetown 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. Georgetown will respond to **traceback requests** from the Commission, civil and criminal law enforcement, and the industry traceback consortium fully and in a timely manner within twenty-four (24) hours.

Customer Education

Georgetown posts information on its website to educate customers on how to protect themselves from becoming a victim of unlawful robocalls and a process to report complaints related to robocall activity.

Information regarding the Georgetown policy regarding customers originating unwanted calls is communicated via the monthly bill messages. Semi-annually, Georgetown also educates its customers on how to add their telephone numbers to the National Do Not Call Registry as well as with the Mississippi "No Call" Program to reduce unsolicited and unwanted telephone solicitation calls.