

PBT COMMUNICATIONS, INC. ROBOCALL MITIGATION PLAN

PBT Communications, Inc., Operating Company Number 3453 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).

PBT Communications, Inc. 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.

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

Robocall Mitigation Plan

All voice traffic that originates on PBT Communications, Inc.'s network is subject to the following Robocall Mitigation Plan.

Call Analytics

PBT Communications, Inc. 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. PBT Communications, Inc., 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. PBT Communications, Inc., 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. PBT Communications, Inc., Inc. will examine the reports and investigate and identify the source of the calls as unlawful or legitimate.

Investigation

PBT Communications, Inc. 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 PBT Communications, Inc. has any other reason to suspect illegal robocalling or spoofing is taking place over its network, PBT Communications, Inc. 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 PBT Communications, Inc. customer is using our network to fraudulently spoof calls or to originate illegal robocalls, PBT Communications, Inc. will immediately mitigate the illegal robocall traffic by either warning the customer to stop such practices or terminating their service as allowed per PBT Communications, Inc. policy.

All PBT Communications, Inc. 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

PBT Communications, Inc. has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. PBT Communications, 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.

Upstream Provider Knowledge

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

Role In the Call Chain

PBT Communications, Inc. is a voice service provider with a STIR/SHAKEN implementation obligation on the IP-Portions of its network. PBT Communications, Inc. 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

PBT Communications, Inc. 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. PBT Communications, Inc. 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

PBT Communications, Inc. has not been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling.

PBT Communications, Inc. 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 PBT Communications, Inc. David Barnes has managing control of PBT Communications, Inc. and its affiliates and subsidiaries. Below are the Parent and/or subsidiaries and affiliates of PBT Communications, Inc.

FILING ENTITY: PBT COMMUNICATIONS, INC.			
<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
Citizens Telephone Company	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