

Fulton Telephone Company, Inc.
Robocall Mitigation Plan

STIR SHAKEN Extension Eligibility Rules

Fulton Telephone Company, Inc. (FTC) is a family owned, U.S. based small/rural carrier with fewer than 100,000 voice subscriber lines. FTC relies upon traditional, non-IP networks for some of its connections to other carriers who do not support IP connectivity at this time, making it eligible for the continuing extension granted under 47 CFR § 64.6304(d).

FTC's phone switch originates or receives calls to or from the public telephone network via traditional TDM-type trunks and via IP-type trunks. Therefore, FTC has implemented SHAKEN/STIR for its IP originated phone traffic sent to other carriers. FTC takes part in industry efforts to develop a TDM solution for this through membership in the National Exchange Carrier Association, which is a member of the ATIS Non-IP Call Authentication Task Force.

In addition to originating calls from its own local switch, FTC offers hosted IP PBX service utilizing the third-party services of Toly Digital Network (Toly). Calls placed through these hosted PBX services are originated via a connection from the customer equipment to Toly's infrastructure, with the call originating from Toly's switch infrastructure and Toly applies their Robocall Mitigation to those calls. A Toly signs the originated outbound calls for FTC utilizing FTC's certificate. As of February 20, 2026, Toly does have a Robocall Mitigation Plan filed and available which indicates their complete STIR/SHAKEN compliance and that they utilize software provided by TransNexus for that purpose and to monitor outbound voice traffic to identify and prevent the potential origination of illegal robocalls. FTC staff routinely monitors the PBX platform for unusual call traffic patterns to identify potential robocall activity. Each customer has a set cap on concurrent calls, preventing any single account from generating excessive traffic.

FTC has implemented the following robocall mitigation program to detect and prevent unlawful robocalls from originating on its network. All calls that originate on FTC's network are subject to the described robocall mitigation program.

Robocall Mitigation Plan

FTC is committed to halting any illegal robocall activity originating on its network. Illegal robocalling activities are prohibited in the company's service terms, and the company will efficiently investigate and act on reported robocalling activity.

FTC's switch is prevented from originating numbers that are not valid North American Numbering Plan (NANP) numbers, known numbers not allocated to a provider and numbers not assigned to a FTC subscriber, as the switch is configured to only originate calls from NPA-NXX's which have been assigned to the switch. Those assigned NPA-NXX's are within FTC's Rate Centers and are either NPA-NXX's assigned to FTC or are NPA-NXX's containing

telephone numbers ported to FTC. Numbers not assigned to a customer or used for internal testing are suspended and cannot originate calls through the switch. FTC has confirmed that their toll traffic provider, Toly Digital Network, blocks 'do not originate' numbers, will cooperate on tracebacks, and that they block any calls from providers the FCC has indicated for such measures. FTC also routinely confirms their toll traffic provider has a Robocall Mitigation Plan currently on file.

-Investigation

Suspect calls and customer complaints are investigated promptly. Investigations may include, but are not limited to call history, call records, and direct inquiry, depending upon the particular circumstances of a suspected incident. Investigation will be initiated within one business day for any customer complaints regarding suspected robocall activity.

-Analytics

FTC does not directly utilize an automated call analytics system. FTC's billing department regularly reviews usage patterns and initiates investigation upon discovery of unusual usage. Regarding third party analytics, FTC's hosted PBX service is processed through Toly's network and receives processing through their third party analytics platform, as outlined in their Robocall Mitigation Plan.

Toly's most recently posted Robocall Mitigation Filing available February 20, 2026 indicates they utilize software provided by TransNexus to monitor outbound voice traffic to identify and prevent the potential origination of illegal robocalls from their network. This analytic system applies to FTC's hosted PBX traffic. The software provides detailed reporting identifying suspected illegal robocalls and alerts Toly if their switch originates any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. Their Robocall Mitigation Plan indicates they immediately investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If they determine that the caller was attempting to originate unlawful robocalls, they either warn them to stop or terminate their service as appropriate. As such, FTC maintains consistent and open communication with Toly as part of our Robocall Mitigation strategy.

-Enforcement

Any FTC customer that is suspected of robocalling will have their voice services suspended immediately pending further investigation. If it is determined a FTC customer is originating prohibited unlawful robocalls on our network, FTC will either warn the customer to cease prohibited activities or terminate their service as allowed per FTC policy. Discovery of customer-originated fraudulent robocall activity will result in reporting of such activity to the appropriate authorities, dependent upon circumstance (for example, public service commission, FCC, etc).

-Know Your Customer

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

FTC knows all the carriers from which it receives traffic, has confirmed that all its connected carriers are listed in the Robocall Mitigation Database, has reviewed the connected carriers' Robocall Mitigation Programs to learn how those carriers monitor their originating traffic and mitigate illegal robocalls. FTC maintains open communications channels with its upstream providers to ensure an efficient means of reporting and mitigating irregular activity, including, but not limited to, fraudulent robocalling activity. FTC incorporates traceback and prohibited traffic language in all new contractual agreements with carriers. FTC does not directly receive traffic from any foreign originating or intermediate provider. No provider is using FTC's network to carry or process a high volume of illegal traffic.

-Role In Call Chain

FTC's role in the call chain is as a voice service provider with a STIR/SHAKEN obligation serving end users. FTC relies upon traditional, non-IP networks for some of its connections to other carriers, making it eligible for the continuing extension granted under 47 CFR § 64.6304(d) with regard to those non-IP connections.

Traceback

FTC 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.

FTC is committed to complying with the FCC's TRACED Act (FCC-20-42A1) and related legally specified traceback requirements, and requires all customers and users of FTC's Voice Service to comply with these laws. Accordingly, as stated in its Terms Of Service, customers may not use FTC equipment, network, facilities, or voice or broadband service in any way to engage in or otherwise permit illegal robocalling or spoofing activities.

Robocall Mitigation Database Eligibility

To our knowledge, FTC, OCN 0455, has NOT been barred from the RMD due to any law enforcement or Commission action as of the time of posting of this document, and is NOT subject to any formal Commission, law enforcement, or other regulatory agency action or investigation due to suspected unlawful robocalling.