

Bruce Telephone Company, Inc.
Robocall Mitigation Plan

STIR SHAKEN Extension Eligibility Rules

Bruce Telephone Company, Inc. (BTC) is a family owned, U.S. based small/rural carrier with fewer than 100,000 voice subscriber lines. BTC 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).

BTC'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, BTC has implemented SHAKEN/STIR for its IP originated phone traffic sent to other carriers. BTC's phone switch also operates as an intermediate/tandem using only TDM connections for that purpose. BTC 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, BTC 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. Toly signs the originated outbound calls for BTC utilizing the certificate of BTC's affiliate, Fulton Telephone Company. 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. BTC 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.

BTC has implemented the following robocall mitigation program to detect and prevent unlawful robocalls from originating on its network. All calls that originate on BTC's network, as well as intermediate traffic transiting BTC's network, are subject to the described robocall mitigation program.

Robocall Mitigation Plan

BTC 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.

BTC'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 BTC 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 BTC's Rate Centers and are either NPA-NXX's assigned to BTC or are NPA-NXX's containing telephone numbers ported to BTC. Numbers not assigned to a customer or used for internal testing are suspended and cannot originate calls through the switch.

BTC 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. BTC 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

BTC does not utilize an automated call analytics system, third party or otherwise. The company's billing department regularly reviews usage patterns and initiates investigation upon discovery of unusual usage. Regarding third party analytics, BTC'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 BTC'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, BTC maintains consistent and open communication with Toly as part of our Robocall Mitigation strategy.

-Enforcement

Any BTC customer that is suspected of robocalling will have their voice services suspended immediately pending investigation. If it is determined a BTC customer is originating prohibited unlawful robocalls on our network, BTC will either warn the customer to cease prohibited activities or terminate their service as allowed per BTC 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).

Any suspected robocall tandem traffic transiting the BTC switch is subject to enforcement action, including, but not limited to, termination of call, suspension of toll provider connection, or other remedies as provided contractually or legally.

-Know Your Customer

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

BTC 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. BTC 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. BTC incorporates traceback and prohibited traffic language in all new contractual agreements with carriers. BTC does not directly receive traffic from any foreign originating or intermediate provider. No provider is using BTC's network to carry or process a high volume of illegal traffic.

-Role In Call Chain

BTC's role in the call chain is a voice service provider with a STIR/SHAKEN obligation serving end users. Additionally, BTC also performs as a non-gateway intermediate provider without a STIR/SHAKEN obligation as pertaining to those non-IP intermediate connections. BTC 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

BTC 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.

BTC 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 BTC's Voice Service to comply with these laws. Accordingly, as stated in its Terms Of Service, customers may not use BTC 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, BTC, OCN 0447, 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.