



Arkansas Telephone Company, Inc. (ARTELCO) Robocall Mitigation Program

This Robocall Mitigation Plan describes the specific reasonable steps that Arkansas Telephone Company, Inc. (ARTELCO) has taken to avoid the origination, carrying, or processing of illegal robocall traffic on its network.

Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Robocalls

ARTELCO has a “know-your-customer” policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. ARTELCO vets the identity of new residential and business customers. ARTELCO’s business customers are mostly small businesses that are physically located in our service territory. As a result, ARTELCO has never received a request for high-volume origination services. However, were ARTECLO to ever receive such a request, we would exercise caution and extensively investigate the requesting entity prior to providing service. In particular, we would collect information such as their physical business location, contact person(s), state or country of incorporation, federal tax ID, and the general nature of their business.

In addition, all ARTECLO customers are only able to originate calls from a number that identifies in the company’s switches as a number that has been assigned to them. This prevents ARTECO’s customers from originating calls with a spoofed caller ID number, which greatly mitigates the likelihood of illegal robocalls originating on ARTELCO’s network.

“Know-Your-Upstream Provider” Procedures

Most of the connections that ARTELCO has with upstream providers have been in place for many years, and we know these companies very well. However, ARTELCO exercises due diligence before accepting traffic from any new upstream provider as we seek to ensure that such providers are not using ARTELCO to carry or process a high volume of illegal traffic. Specifically, ARTELCO collects information such as the upstream provider’s physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of their business.

Use of Call Analytics Systems

ARTELCO’s underlying long distance carrier, Sinch, will notify ARTELCO if they observe excessive call volumes or suspicious call patterns originating on an ARTELCO customer’s line. If ARTELCO were to be notified of such an issue, we would contact the customer to investigate the purpose of the calls. If, upon investigation, it was determined the customer was using their



voice service to make illegal robocalls, ARTELCO would act quickly to put an end to the unlawful activity, and may suspend or terminate the customer's service as appropriate.

Commitment to Respond to Traceback Requests

ARTELCO commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its services to originate, carry, or process illegal robocalls.

Randy McCaslin

Randy McCaslin – President / General Manager

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