



Robocall Mitigation Plan – February 2026

Northern Arkansas Telephone Company, Inc. (NATCO) is a rural company located in North Central Arkansas providing voice and broadband services. NATCO is fully committed to preventing robocalls from originating from their network. Their robocall mitigation program is dedicated to keeping all access lines from originating and receiving illegal robocalls to the extent possible.

Although NATCO has limited capability to send/receive calls via Internet Protocol, the majority of its voice traffic transmits over TDM trunks leaving and entering the network through intermediate providers. This prevents the full implementation of STIR/SHAKEN for voice traffic on those non-IP portions of the network at this time. NATCO relies on the continuing non-IP networks extension under 47 CFR § 64.6304(d) for those portions of its network that cannot initiate, maintain, and terminate SIP calls. NATCO submits this robocall mitigation plan pursuant to 47 CFR § 64.6305 and related FCC robocall mitigation and caller ID authentication requirements. All calls that originate from NATCO's voice network are subject to this robocall mitigation program and NATCO has implemented the steps in this robocall mitigation plan.

FCC rules require voice service providers to: (1) respond to traceback requests from the Commission, civil and criminal law enforcement, and USTelecom's Industry Traceback Group ("Consortium"); (2) take steps to effectively mitigate illegal traffic when the provider receives actual written notice of such traffic from the Commission; and (3) implement affirmative, effective measures to prevent new and renewing customers from using the provider's network to originate illegal calls. This plan describes each obligation and NATCO's action steps and procedures.

Respond to Traceback Requests from the Commission, Civil and Criminal Law Enforcement, and the Consortium.

As the Commission states, traceback is an essential tool for determining the source of illegal robocalls. NATCO will respond fully and within 24 hours to all traceback requests from the groups listed above. To facilitate this response, NATCO has designated points of contact to handle traceback requests. Those points of contact are (1) Mark V. Principato, Infrastructure Manager; and (2) Tim McEuen, Director of Customer Care. Both may be reached at NATCO, 301 E. Main St, Flippin, AR 72634; by calling 870 453-8800; or by email at markvp@natconet.com and tmceuen@natconet.com. These points of contact and contact information will be updated, as necessary.



In responding to traceback requests, NATCO uses available call records and network data to identify the source and path of traffic. NATCO also uses Ribbon Communications software for real-time outbound traffic analytics to help prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts us if we originate 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. NATCO implements call-blocking measures, including blocking calls using a reasonable do-not-originate (DNO) list, in accordance with 47 CFR § 64.1200(o). Where calls are blocked over SIP based on reasonable analytics, NATCO uses appropriate SIP signaling (including 603+ where required). We immediately investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If we determine that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as appropriate. With the information we are able to obtain, we will cooperate and respond fully and timely to any traceback request from the Commission, civil and criminal law enforcement, and the Consortium. If the request comes from the Commission and/or law enforcement, we will ensure that any such requests are consistent with other legal and regulatory requirements.

Take Steps to Effectively Mitigate Illegal Traffic when Notified by the Commission-

NATCO is committed to mitigating illegal traffic on its network. As such, NATCO will take decisive action when notified by the Commission of suspected illegal calls. When NATCO receives notice from the Commission of suspected illegal calls, NATCO will promptly initiate an investigation into the traffic in question to determine, to the best of our ability, whether the traffic is in fact illegal robocalls, and to respond to the Enforcement Bureau with the results of that investigation. The investigation will involve researching and identifying the source of the traffic in question on NATCO's network and the origin of that traffic.

During our investigations, we would utilize Ribbon Analytics solutions so we can monitor call logs/history along with customer inquiries as necessary. If we determine that the traffic is not illegal, NATCO will provide to the Commission an explanation as to why we concluded the identified calls were not illegal and what steps we took to reach that conclusion. Reasons for such a conclusion may vary but might include, for example, verifying that the robocalls were for a legally permitted purpose or that the customer had written consent from the called parties to send such calls. If a NATCO customer claims that its traffic is legal when that traffic has been flagged by the Commission, NATCO will require documented proof of prior



express written consent from any called parties. NATCO will refer any callers who believe they have been blocked in error to the Commission for review.

If our investigation determines that the traffic is suspect or, indeed, illegal, NATCO will take steps to mitigate that traffic according to the origin of the traffic on NATCO's network. For example, if we are notified about suspect traffic and we determine that the traffic in question entered our network not from a NATCO customer but from an upstream provider, we will inform the Commission of the source of the traffic and contact the upstream provider directly to inform them of the suspect traffic. NATCO maintains business relationships with our upstream providers and vets them before routing traffic through their networks. Each year NATCO verifies that our upstream providers are in good standing with their robocall mitigation plan and Robocall Mitigation Database filing and maintains updated points of contact for enforcement and traceback purposes. NATCO will notify the upstream provider that NATCO, in accordance with applicable law, will to the best of its ability, prevent illegal traffic from entering its network, including blocking calls from problem upstream providers identified as a source of illegal robocalls. In the event that a problem upstream provider continues to send illegal robocalls to NATCO's network, NATCO will block that problem provider's traffic until that provider ceases to send illegal robocalls. NATCO's upstream long-distance providers also report back to us if they notice illegal traffic entering their networks from our network.

If NATCO determines that the illegal traffic originated from a NATCO customer, NATCO will immediately notify and inform that customer and take steps to prevent the customer from originating illegal robocalls. This can include a variety of mitigating actions, including implementing mandatory account codes for outdialing; barring calls to local numbers, national numbers, international numbers, or any combination of the three; blocking outgoing calls, incoming calls, or both; and/or severing NATCO's relationship with that customer if no other action solves the problem.

Implement Effective Measures to Prevent New and Renewing Customers from Originating Illegal Calls

NATCO believes that the best way to stop illegal robocalls is to prevent them from originating on our network. One of the biggest frustrations in the pervasiveness of illegal robocalls is caller ID spoofing. It is important to remember that some robocalls are legal, and NATCO wants to ensure to the extent possible that its customers who originate legal robocalls are not blocked. Caller ID spoofing often



differentiates a legal robocall from an illegal robocall. Illegal robocallers like to spoof their numbers to prevent their victims from knowing the actual source of the call. NATCO already has measures in place to prevent caller ID spoofing on our network. Through our softswitch, we only allow a customer to originate calls from a number that identifies in our switch as a number that has been assigned to that customer. This prevents a NATCO customer from originating calls with a spoofed caller ID number. We feel that this is the best protective measure that a voice service provider can implement to prevent illegal robocalls while allowing legal robocalls. These measures support NATCO's obligation to know its customers and prevent caller ID spoofing under 47 CFR § 64.1200(n)(4).

NATCO is a small rural service provider. Our service territory is limited to two counties in North Central Arkansas. As such, we are familiar with our customers and have a designated Business Representative that handles our relationship with business customers who, if any, are high-volume originators of calls. For new and renewing customers, NATCO evaluates account information and calling needs as appropriate and monitors originating traffic for unusual calling patterns. If NATCO discovers through a review of call logs or traceback of behaviors that any customer is exhibiting unusual calling behavior in originating excessive calls, or NATCO receives a complaint about a NATCO customer originating excessive calls, NATCO will contact that customer to determine whether any suspected illegal robocalling is taking place. NATCO will then take mitigating steps as necessary and as described above.

Any special requirements for NATCO customer call traffic that are determined to be lawful uses will be documented and handled on a case-by-case basis. If necessary, special contracts will be established clarifying the proper uses of call origination services, and service will be terminated for abuses.

Technological Advances and Upgrades for STIR/SHAKEN

NATCO is authenticating and verifying with STIR/SHAKEN voice traffic that originates and terminates on the IP portions of the company's network that support SIP calls. For SIP calls that NATCO originates on those IP portions of the network, NATCO signs calls using NATCO's own Secure Telephone Identity (STI) certificate and SPC token. Among other things, NATCO has been authenticating caller ID information for all SIP calls that originate on those portions of the network. However, there are still portions of its network that are non-IP and cannot support STIR/SHAKEN. Therefore, for those non-IP portions of its network, NATCO will continue to avail itself of the ongoing non-IP networks extension afforded under 47 CFR § 64.6304(d)



of the FCC's rules. NATCO will implement a call authentication protocol for voice calls delivered over the non-IP portions of its network when such a protocol is fully developed and finalized by industry standards and the necessary equipment and software is available on the commercial market.

NATCO will continue to monitor the industry for any technological advancements or upgrades in the implementation of STIR/SHAKEN, including participating in relevant classes and online training. NATCO also will continue to evaluate its own network and those of our upstream carriers for the feasibility of implementing a full SIP network for our call traffic. NATCO is committed to protecting our customers from illegal robocalls by utilizing the most effective resources available that are compatible with our network and are financially reasonable for the fiscal health of the company.



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Northern Arkansas Telephone Company, Inc. is not a foreign voice service provider.