

Reservation Telephone Cooperative ROBOCALL MITIGATION PLAN

Reservation Telephone Cooperative (Reservation), Operating Company Number 1632, Reservation 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).

To meet the non-IP network criteria for the continuing STIR SHAKEN extension (§ 64.6303 (a)(2)), Reservation is a member of NTCA. NTCA participates on the ATIS PTSC Non-IP Call Authentication Task Force working group which developed the (ATIS Solutions) non-IP call authentication solutions. NTCA is serving as Reservation's third-party representative on the ATIS PTSC Non-IP Call Authentication Task Force working group.

Reservation provides voice service to fewer than 100,000 voice subscriber lines. Some customers are still served on the non-IP portions of Reservation's network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

Reservation non-IP network is connected to carriers that do not support IP connectivity; therefore, Reservation cannot upgrade the Non-IP portions of its network to IP connectivity.

Reservation has contracted with Toly Digital to provide numbering for assignment to some of Reservation's customers. Reservation and Toly Digital connect via SIP. Toly Digital has fully implemented STIR/SHAKEN within its network and signs the originating calls on behalf of Reservation's customers routing on their IP network. Toly Digital has also deployed the Transnexus robocall mitigation solution.

Reservation also originates calls via SIP connections within its network. Reservation has registered with the Policy Administrator and is an authorized service provider in the STIR|SHAKEN ecosystem. Reservation has implemented STIR|SHAKEN within its IP-network and signs the calls originating on the IP portions of its network.

Robocall Mitigation Plan

All voice traffic that originates on Reservation's network is subject to the following Robocall Mitigation Plan.

Call Analytics

Reservation has contracted with Ribbon for its Call Trust product which provides robocall analytics and reputation scoring of our network's outbound traffic. The vendor uses software to monitor outbound voice traffic in real time and provides detailed reporting identifying if our network 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. Reservation has

access to the vendor's portal and receives notifications about telephone numbers originating suspected illegal robocalls on its network. The software's identification of suspected illegal robocalls and alerts helps prevent the origination of illegal robocalls.

Terminating Robocall Mitigation

Reservation uses Innovative Systems' Terminating Call Manager which analyzes and validates the validity of calls terminating to Reservation's network.

Investigation

Reservation investigates calls identified by its analytics vendor potential illegal robocalls or those that have abnormal call volumes, patterns or activity consistent with illegal robocalls.

In addition, if Reservation has any other reason to suspect illegal robocalling or spoofing is taking place over its network, Reservation 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 Reservation customer is using our network to fraudulently spoof calls or to originate illegal robocalls, Reservation will either warn the customer to stop such practices or terminate their service as allowed per Reservation policy.

All Reservation 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

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

Residential customers are asked to provide their full name, address (physical and mailing, if different), last four digits of their social security number, date of birth, phone number, email, and establish a security question, and a password. Business customers are asked to provide their full name, address (physical and mailing, if different), tax identification number, phone number, email, and establish a security question, and a password. To initiate an account change, a customer must provide their password or the answer to their security question prior to initiating a change. If the customer is unable to provide that information the customer service representative will call the customer back using the number they provided at account setup. Reservation also requires a photo ID for all new customers requesting voice service.

Upstream Provider Knowledge

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

Role In the Call Chain

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

Reservation 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. Reservation will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium fully and in a timely manner within twenty-four (24) hours.

Robocall Mitigation Database Eligibility

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

Reservation has not been prohibited from filing in the Robocall Mitigation Database (RMD).

Customer Education

Reservation posts information on its website to educate customers on how to protect themselves from becoming a victim of unlawful robocalls and a process to report complaints related to robocall activity.