



Improving the Quality of Life in the Communities We Serve

ROBOCALL MITIGATION PLAN FRN

0001612555

Overview

This document constitutes PVT Networks, Inc.'s Robocall Mitigation Plan.

PVT Networks has implemented STIR/SHAKEN on all IP portions of its network.

A service provider's Robocall Mitigation Plan will be deemed sufficient by the Federal Communications Commission (FCC) if the service provider:

- Includes detailed practices that can reasonably be expected to significantly reduce the origination of illegal Robocalls;
- Complies with the practices it describes; and
- Participates in industry Traceback efforts.

1. Objective and scope of PVT Networks Robocall Mitigation Program Plan:

PVTN uses software provided by a third party to monitor our outbound voice traffic to 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 the call source has a poor reputation.

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.

Calls from directory numbers not originated by PVTN/PVT COOP subscriber directory numbers are automatically blocked from exiting the digital switch.

2. PVT Networks investigates suspicious traffic and has policies in place to suspend service to offending end users.

PVT Networks investigates suspicious traffic and is dedicated to collaborating with relevant stakeholders.



Improving the Quality of Life in the Communities We Serve

PVT Networks takes the following steps once it has identified suspicious traffic:

- (a) The customer account is analyzed by appropriate trained personnel;
- (b) If PVT Networks personnel are unable to determine the legitimacy of the traffic, the customer is contacted, and a further investigation is carried out;
- (c) If PVT Networks personnel are still unable to determine the legitimacy of the traffic, PVT Networks proceeds to suspend service;
- (d) PVT Networks collaborates with other carriers expeditiously and in good faith on any investigation of suspicious activity.

3. PVT Networks commits to cooperate with the Industry Traceback Group, regulators and law enforcement.

PVT Networks commits to respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

The PVT Networks contact responsible for addressing robocall mitigation-related issues is:

James Bratcher
Network Manager
Plant and Operations Department 4011
W. Main St.
Artesia, NM 88210
575-748-1241
jbratcher@pvt.com

PVT Networks has STIR/SHAKEN authentication framework on all IP portions of its network, and all calls originating on its network are subject to a robocall mitigation program as described herein.

I hereby certify under penalty of perjury that the foregoing is true and correct.

A handwritten signature in black ink, appearing to read "Kurt Garrard", written over a horizontal line.

Kurt Garrard, CFO

2/4/2024

Date