



Improving the Quality of Life in the Communities We Serve

ROBOCALL MITIGATION PLAN FRN 0018563023

Overview

This document constitutes Peñasco Valley Telephone Cooperative, Inc.'s Robocall Mitigation Plan.

PVT's switch is still 100% TMD and incompatible with the STIR/SHAKEN framework.

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 Peñasco Valley Telephone Cooperative, Inc. Robocall Mitigation Program Plan

Peñasco Valley Telephone Cooperative, Inc. 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, 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. Peñasco Valley Telephone Cooperative, Inc. investigates suspicious traffic and has policies in place to suspend service to offending end users.

Peñasco Valley Telephone Cooperative, Inc. investigates suspicious traffic and is dedicated to collaborating with relevant stakeholders.



Improving the Quality of Life in the Communities We Serve

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

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

3. Peñasco Valley Telephone Cooperative, Inc. commits to cooperate with the Industry Traceback Group, regulators and law enforcement.

Peñasco Valley Telephone Cooperative, Inc. 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.

Peñasco Valley Telephone Cooperative, Inc. 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

Peñasco Valley Telephone Cooperative, Inc. has not implemented the STIR/SHAKEN authentication framework on any portion of its network, and all of the calls that originate 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.

Kurt Garrard, CFO

Date