

Shenandoah Telecommunications Company ROBOCALL MITIGATION PLAN

Shenandoah Telecommunications Company (Shentel), together with its affiliates referenced in Table 1, is eligible for the continuing extension of the STIR/SHAKEN implementation for Non-IP Networks 64.6304 (d), we comply with 64.6303 (a) (2) as a participant in the ATIS Non-IP Call Authentication (NIPCA) Task Force. The assigned Operating Company Numbers are 0250, 0236, 4979, 489F, and 836G.

Table 1

Company Name	FRN	OCN's
Shenandoah Telecommunications Company	0002064145	
Shenandoah Telephone Company	0002072668	0236, 0250
Shenandoah Cable Television, LLC	0021657853	4979, 489F, 836G

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

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

Robocall Mitigation Plan

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

Call Analytics

Shentel has contracted with Transaction Network Services (TNS) to provide robocall analytics and reputation scoring of Shentel's network outbound traffic. The vendor uses software to monitor outbound voice traffic in real time and provides detailed reporting identifying if Shentel's 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. Shentel has access to the vendor's portal and receives daily 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.

Shentel blocks the origination of calls from unassigned telephone numbers out of its assigned NPA-NXX inventory and calls originating from numbers that are not valid NANP numbers. Examples of such invalid numbers include those that use an unassigned area code; that use an abbreviated dialing code, such as 91155 or 411, in place of an area code; that do not contain the requisite number of digits; and that are a single digit repeated, such as 000-000-0000, with the exception of 888-888-8888, which is an assignable number.

Shentel also blocks the origination of calls from telephone numbers on its internal Do Not Originate (DNO) list.

Investigation

Shentel investigates calls identified by TNS as suspicious calls or those that have abnormal call volumes, patterns or activity consistent with illegal robocalls.

In addition, if Shentel has any other reason to suspect illegal robocalling or spoofing is taking place over its network, Shentel will work internally to identify the party that is using Shentel's network to originate, route, or terminate such calls and take appropriate action.

Enforcement

Illegal robocalls and fraudulent spoofing is prohibited on Shentel's network. If it is determined, a Shentel customer is using its network to fraudulently spoof calls or to originate illegal robocalls, Shentel will warn the customer to stop such practices or terminate their service as allowed per Shentel policy.

Know your Customer

Shentel conducts reasonable due diligence on new and renewing customers in order to protect its own business interests. These measures include confirming the customer's service address and obtaining a valid tax identification number before initiating service.

Shentel requires that all customers accept an acceptable use policy that prohibits the customer from making unlawful calls, harassing, and other illegal or improper uses of the services. The acceptable use policy describes the circumstances in which Shentel will deny, suspend, or terminate service to a customer for engaging in prohibited conduct.

Shentel's network only allows the origination of calls from telephone numbers that are assigned by or ported to Shentel. Shentel also uses TNS Call Guardian analytics technologies and services to monitor traffic on its network and identify potentially unlawful call origination activity.

Upstream Provider Knowledge

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

Role in the Call Chain

Shentel is a voice service provider with a STIR/SHAKEN implementation obligation on the IP-Portions of its network. Shentel 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. In addition, Shentel is a non-gateway intermediate provider without a STIR/SHAKEN obligation as Shentel does not transit SIP calls between carriers.

Traceback

Shentel commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that Shentel determines are using Shentel's service to originate calls. Shentel commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium within 24 hours.

Robocall Mitigation Database Eligibility

Shentel has not, within the prior two years, been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling.

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

Customer Education

Shentel 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.

Legal Structure as of December 31, 2025

