



PINNACLES TELEPHONE CO

340 LIVE OAK RD
PAICINES, CA 95043
(831) 389-4500

Tuesday, December 17, 2024

To: Whom it may concern, FCC

From: Pinnacles Telephone Co.

Subject: Robocall Mitigation Program

This Robocall Mitigation Plan describes the specific reasonable steps that Pinnacles Telephone Company (Pinnacles) has taken to avoid the origination, carrying, or processing of illegal robocall traffic on its network. Pinnacles is the smallest incumbent local exchange carrier (ILEC) in California, with fewer than 100 voice service customers.

Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Robocalls

Pinnacles has a “know-your-customer” policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. All of Pinnacles’ business customers are small businesses that are physically located in our service territory. Prior to a new business customer ever making a call on Pinnacles’ network, we personally know, or get to know, the business owners and/or management. This personal touch gives Pinnacles a clear view of whether the business is a risk for originating illegal robocalls.

Pinnacles has never received a request for high-volume origination services. That said, were Pinnacles to ever receive such a request, we would exercise caution and extensively investigate the requesting entity prior to providing service. In particular, we would collect information such as their physical business location, contact person(s), state or country of incorporation, federal tax ID, and the general nature of their business.

In addition, as a very small voice service provider, Pinnacles would be able to quickly recognize and address illegal robocalls originating on its network. Illegal robocalls originating on Pinnacles’ network would present as long distance calls, for which there are detailed call records. Pinnacles’ President, Steven Bryan, monitors the number of long distance calls placed by Pinnacles’ customers on a daily basis. Therefore, Mr. Bryan would be promptly alerted to an abnormally high volume of long distance calls and could identify the source of those calls. If, following an investigation, it was determined that a customer was using their service to originate illegal traffic, Pinnacles would not hesitate to suspend or terminate their service, as appropriate.

“Know-Your-Upstream Provider” Procedures

Currently, the only upstream provider from which Pinnacles receives traffic is AT&T. Pinnacles’ connection with AT&T has been in place for decades, and we know this provider very well. Before accepting traffic from any new upstream provider, Pinnacles would exercise due diligence and seek to ensure that the provider is not using Pinnacles to carry or process a high volume of illegal traffic. Specifically, Pinnacles would collect information such as the upstream provider’s physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of their business.

Use of Call Analytics Systems

Pinnacles does not presently use any call analytics systems to identify and block illegal robocall traffic.

Commitment to Respond to Traceback Requests

Pinnacles commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its services to originate, carry, or process illegal robocalls.