

WILKES TELEPHONE & ELECTRIC COMPANY

ROBOCALL MITIGATION PLAN

Wilkes Telephone & Electric Company is a small/rural carrier that was eligible for the STIR/SHAKEN extension granted to small voice service providers with fewer than 100,000 voice subscriber lines under 47 CFR § 64.6304.

Wilkes Telephone & Electric Company has implemented the STIR/SHAKEN authentication framework on its network and has been fully compliant as of June, 2023. All of the voice traffic that originates on Wilkes Telephone & Electric Company's network are subject to the robocall mitigation program described herein and is 100% STIR/SHAKEN compliant.

Wilkes Telephone & Electric Company has contracted with a third-party vendor, (Transnexus, Inc.), to provide robocall analytics and reputation scoring of our network's traffic. The vendor's analytics identify patterns of suspected illegal robocalls and scores the calls based on their behavior and/or their status as suspected robocalls as reported to the Federal Communications Commission (FCC), Federal Trade Commission (FTC), and as reported by other carriers. Wilkes Telephone & Electric Company will have access to the vendor's portal and receive notifications about telephone numbers originating suspected illegal robocalls on its network, including from unassigned, inactive and do-not-originate telephone numbers. Wilkes Telephone & Electric Company will also receive reports via e-mail alerts if any of its numbers experience a change in reputation such as suspicious traffic patterns or other detected anomalies outside the normal behavior of our company's traffic. Wilkes Telephone & Electric Company will examine the reports and investigate and identify the source of the calls as unlawful or legitimate.

Purpose:

Wilkes Telephone & Electric Company recognizes the impact of Robocalls to our customers and our industry as a whole and will follow FCC guidelines and rules to be fully STIR/SHAKEN compliant by or before the established and published deadlines.

Details:

Currently, Wilkes Telephone & Electric Company has taken reasonable steps and has mitigation processes in place to recognize and to ultimately reduce the origination of illegal robocalls on our network and continuously works to expand and enhance them. These processes include:

Policing and Monitoring

- Continuous monitoring and analyzation of originating call detail records to identify anomalies and abnormalities that conflict with our established baselines of normalcy. Our baselines of normalcy are established over years of analyzing voice traffic on our network and the typical behavior of our voice subscribers. Using this historical data, past and present, we are able to easily identify potentially malicious behavior and act quickly to qualify legitimacy and mitigate when necessary. Mitigation may include subscriber services termination.

- Participation in toll fraud mitigation with one of our partners that is designed to specifically identify and mitigate robocalls and call pumping. This toll fraud mitigation actively monitors area codes and OCN's with a history of illegitimate intent and has technical processes in place to flag and block calls based on unusual activity. Some of the unusual activities include frequency of calls to one number in short periods of time (call pumping) and the length of calls, etc.
- We monitor our IP network utilizing network monitoring tools to identify abnormalities within our Session Border Control and throughout our voice delivery network. We block offending IP's and phone numbers as we identify abuse participants.
- We have security measures in place to prevent unauthorized access to subscriber phones and voicemail.

Business Practices:

- Wilkes Telephone & Electric Company has standard practices of confirming that businesses are legitimate and have legitimate, normal, and well-intended interest in the use of our voice services prior to permitted use.
- All subscribers are subject to vetting of their identity and legitimacy which includes:
 - Physical business location
 - Contact person responsible for the account
 - State or County of incorporation
 - Nature of customers business

Upstream Provider Knowledge:

Wilkes Telephone & Electric Company knows all the carriers from which it receives traffic and has confirmed that all the carriers are listed in the Robocall Mitigation Database. No provider is using the Wilkes Telephone & Electric Company network to carry or process a high volume of illegal traffic. Wilkes Telephone & Electric Company monitors incoming traffic from all connected carriers for suspicious call patterns indicative of illegal robocall activity. The connected carriers are made aware of any suspicious or illegal traffic and notified that, if the traffic does not cease, the calls may be blocked from entering the Wilkes Telephone & Electric Company network. In addition, Wilkes Telephone & Electric Company is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.

Inbound & Outbound DNO List Comparison & Blocking:

- In late 2025 Wilkes Telephone & Electric Company approached its third-party vendor, (Transnexus, Inc., Clear IP), to implement their Inbound & Outbound DNO List Comparison Service in our voice network. This service was implemented prior to the December 15, 2025 due date as directed by the FCC's rule contained in 47 CFR § 64.1200 (o).
- This service compares ALL calls in both directions traversing Wilkes Telephone & Electric Company's voice switch with their aggregate DNO list which includes the official Industry Traceback Group (ITG) list along with many more invalid prefix patterns. All flagged calls are promptly blocked.
- The aggregate DNO list provided by (Transnexus, Inc., Clear IP) is obtained from the Industry Traceback Group will be updated quarterly in our system with any changes

Traceback, Communications and Education:

Wilkes Telephone & Electric Company is committed to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocalls that we learn are using our service to originate calls.

- Wilkes Telephone & Electric Company has a dedicated contact for receiving communications or points of concern for traceback investigations.
- Wilkes Telephone & Electric Company commits to responding fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium.
- Wilkes Telephone & Electric Company posts information on its website and telephone directory 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.
- Wilkes Telephone & Electric Company will cooperate with such entities in investigating and stopping any illegal Robocallers that use its service to originate calls.
- Wilkes Telephone & Electric Company commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium within twenty-four (24) hours.

Customer Vetting

Wilkes Telephone & Electric Company has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Wilkes Telephone & Electric Company thoroughly vets new residential and business customers by encouraging the use of the Do Not Call Registry and by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services.

Enforcement

If it is determined a Wilkes Telephone & Electric Company customer is originating prohibited unlawful robocalls on our network, Wilkes Telephone & Electric Company will either warn the customer to stop or terminate their service.

Customer Education

Wilkes Telephone & Electric Company posts information on its website and telephone directory 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.

Company Information:

Wilkes Telephone & Electric Company, dba Relyant Communications, LLC
11 Court Street
PO Box 277
Washington, GA. 30673

Other business names in use by the voice service provider – Relyant Communications

Robocall Mitigation Contact:

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