

Arrowhead Electric Cooperative, Inc.

Robocall Mitigation Plan

1. The following documentation is to serve as the Robocall Mitigation Program of ARROWHEAD ELECTRIC COOPERATIVE, INC. (Company) and their ongoing compliance with the Traced Act.
2. Arrowhead Electric Cooperative is a Voice Service Reseller and does not have either an OCN or a RespOrgID and thus is not eligible to apply for an SPC Token through Iconectiv. Part 64.6304(b) states the voice service providers that are incapable of obtaining an SPC token due to Governance Authority policy are exempt from the requirements of 64.6301 until they are capable of obtaining an SPC token. Arrowhead Electric's wholesale voice service provider is Consolidated Telephone Company. The Company has not implemented the STIR/SHAKEN authentication framework on any portion of its network. The Company has committed to a RoboCall Mitigation Program consistent with 47 CFR § 64.6305 for all originating calls made from its network.
3. The Company (and/or any entity for which the Company shares common ownership, management, directors, or control) has not been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the Company transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.
4. Arrowhead Electric Cooperative, Inc purchases voice switching from a third-party vendor. The Company has confirmation from the vendor that they have filed a Robocall Mitigation Plan that will adhere to the relevant FCC requirements.
5. Arrowhead Electric Cooperative, Inc. commits to respond to all trace back requests from the Commission, law enforcement and the industry traceback consortium. Arrowhead Electric Cooperative, Inc. will respond fully and within 24 hours to traceback requests from such entities and will cooperate in investigating and stopping any illegal robocallers that use its network to originate calls. If one of Arrowhead Electric Cooperative, Inc.'s customers determines that their number has been spoofed and reports it to our staff, Arrowhead Electric Cooperative, Inc. will initiate a traceback request with the industry traceback consortium.
6. Arrowhead Electric Cooperative, Inc. has taken the following steps (through our wholesale vendor) to detect and avoid originating illegal robocalling traffic on our network as part of our Robocall Mitigation Program.
 - a. Arrowhead Electric Cooperative, Inc. through their wholesale vendor has contracted with Intelliquent to utilize their STIR/SHAKEN product for all originating traffic that is delivered to the Intelliquent tandem.
 - b. All Arrowhead Electric Cooperative, Inc. outbound traffic not sent to the Intelliquent tandem will be monitored daily via internal analytics and unusual increases in voice network traffic will be investigated to identify the customer generating the traffic. The customer will be contacted to determine the cause of the high volume traffic. If it is determined to be illegal robocalling traffic, steps will be taken to block the illegal robocalls.
 - c. If a new or existing customer orders more than five service lines, they will be contacted to determine the intended use of the service. If it is determined that the services will be used for illegal robocalls, we will refuse to initiate the services. If it is determined that the lines are needed

for legitimate calls, we will install the additional service lines and put them on a “watch list” in case their business model changes.

- d. Arrowhead Electric Cooperative, Inc. knows all the carriers from which it receives traffic and has confirmed that all carriers in which it exchanges traffic and from which it receives traffic are listed in the Robocall Mitigation Database. Basic identification information, such as physical business location, contact person(s), state of incorporation, and nature of business, are collected for all of the Company’s up-stream providers. Going forward, all interconnection agreements will include prohibited traffic and traceback language.
- e. As part of its Plan to mitigate and prevent any originating robocalls on its network, the Arrowhead Electric is committed to early identification and investigation of possible robocalling situations. In monitoring usage of its network, particular attention is given to: (1) higher than normal subscriber traffic volume including large bursts of traffic in small timeframes or inconsistent volumes of traffic (spikes in usage); (2) originating calls of short duration and low call completion percentages; (3) originating calls with sequential called to number dialing patterns; (4) repeated calls made to do-not-call registry or invalid numbers; and (5) calls to NPA-NXXs not assigned by the North American Numbering Plan Administrator.
- f. Arrowhead Electric (through its wholesale vendor) utilizes a third-party “Analytics” platform provided by TransNexus (Clear IP TransNexus) to support the effectiveness of its Robocall Mitigation Plan. This includes, as examples, the use of “Telecom Fraud Prevention” and “Robocall and Telephone Denial of Service (TDos) Prevention” services, which include more specifically the use of the following methods/tools as a means of preventing and blocking fraudulent and illegal robocalls on its network: the use of CDRs and related reports for determining mitigation actions; use of SIP Analytics enabling real time traffic analysis and detection and mitigation of robocalls at origination; use of blacklisting and whitelisting to mitigate calls with specific attributes; use of CAPTCHA gateway services to distinguish whether calls are from humans or autodialers; use of a “Shield” database that screens calls at origination for calling numbers that are invalid, high-risk, or appear on “Do Not Originate” lists; and use of reputation look up services on calling numbers at origination.