



P.O. BOX 369 • PLEASANT VIEW, CO 81331-0369
PHONE 970-562-4211 • FAX 970-562-4214

Farmers Telephone Company, Inc. Robocall Mitigation Program

This Robocall Mitigation Plan describes the specific reasonable steps Farmers Telephone Company, Inc. (Farmers) has taken to avoid the origination, carrying, or processing of illegal robocall traffic on its network.

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

Farmers has a “know-your-customer” policy through which we exercise due diligence in ensuring that our services are not being used to originate illegal traffic. Specifically, for new and renewing customers, Farmers:

- Confirms the customer’s identity and, if it is a business, it’s incorporation documents.
- Confirms the customer’s service address.
- Verifies customer information when contracts are renewed or services are added.
- Verifies the customer’s identity and their right to use the telephone number presented on calls.

Although Farmers customer’s generally do not generate a high volume of calls, were Farmers to receive a request for high-volume origination services, it would exercise caution and extensively investigate such customers before granting access to the services.

In addition, Farmers has policies that define the circumstances by which it will deny, suspend, or terminate service to a customer.

“Know-Your-Upstream Provider” Procedures

Currently, there are only two upstream providers from which Farmers receives traffic: Sinch and CenturyLink. Farmer’s connections with these providers have been in place for many years, and we know these companies very well. However, Farmers exercises due diligence before accepting traffic from any new upstream provider as we seek to ensure that such providers are not using Farmers to carry or process a high volume of illegal traffic. Specifically, Farmers collects 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



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Farmers uses Transaction Network Services (TNS) Call Guardian analytics technologies and services to monitor traffic on its network and identify potentially unlawful call origination activity. If Farmers has a reasonable basis to believe that a customer is originating illegal robocalls, it will require the customer to remedy the problem. If effective action is not taken, Farmers will suspend and/or terminate service to the customer.

In addition, Farmers has deployed call authentication, call labeling, and call blocking services provided by TNS. Farmers blocks the following types of calls by default:

- Calls originating from invalid numbers.
- Calls from phone numbers on a Do-Not-Originate list.

Commitment to Respond to Traceback Requests

Farmers 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 illegal robocallers that use its services to originate, carry, process illegal robocalls.