

TenKal Company's Robocall Mitigation Program

TenKal Company (the "Company") is a "non-gateway intermediate provider," as that term is defined in Section 64.6300(i) of the rules of the Federal Communications Commission (the "Commission").

Company Network

The Company's operating network relies entirely on technology that cannot initiate, maintain, carry, process and terminate SIP calls. Accordingly, the Company has a continuing extension pursuant to Section 64.6304(d) of the Commission's rules.

Robocall Mitigation Program

The Company has implemented a robocall mitigation program that includes the following elements:

Know Your Customer

The Company is under common control and management with two "small voice service providers," as that term is defined in Section 64.6304(a)(2) of the Commission's rules. The only persons or entities that are permitted to become customers of the Company are end users of the local exchange services of one or both of those voice service providers, and then only in that capacity. The confirmation of the identity of such end users is performed by one or both of those voice service providers on the Company's behalf. Those voice service providers' "know your customer" programs for retail, end user, voice service customers consist of the practices more fully described in their respective Robocall Mitigation Programs filed in the Commission's Robocall Mitigation Database and, in relevant part, described below under the heading "Reasonable Steps To Avoid Carrying Originating Illegal Robocall Traffic."

Know Your Upstream Provider

The Company's only upstream providers are the two small voice service providers mentioned above that are under common control and management with the Company. By virtue of that common control and management, the Company knows its upstream providers.

Contract Provisions

The Company's services to end user customers are governed by written terms and conditions. Those terms and conditions prohibit use of the Company's services for unlawful purpose, or, in certain instances, for any purpose prohibited under the provisions of any regulatory order, and permit suspension or termination of service by the Company for violation thereof.

Reasonable Steps To Avoid Carrying Originating Illegal Robocall Traffic

The identity of all subscribers to the Company's originating voice services is vetted via the Company's application process, or the application processes of the above-mentioned small voice service providers with which the Company is under common control and management, to ensure valid use of telephone number resources.

On behalf of themselves and the Company, the above-mentioned small voice service providers with which the Company is under common control and management, follow best practices for vetting the identity of subscribers to voice services that it provides, identified more fully under

Best Practice #1 set forth in Appendix A to Public Notice DA 20-1526, released December 22, 2020, by the Wireline Competition Bureau of the FCC in WC Docket Nos. 17-97 and 20-324 (“DA 20-1526 Appendix A”).

Commitment

In its capacity as an “intermediate provider,” as that term is defined in Section 64.6300(g) of the Commission’s rules, the Company is committed to responding within 24 hours to all lawful traceback requests from the Commission, law enforcement, and the industry traceback consortium, and, to the extent permitted by law, to cooperating with such entities in investigating and stopping the use of the Company’s services in that capacity to carry or process illegal robocalls by any illegal robocallers.

Principals, Affiliates, Subsidiaries, and Parent Companies

Shareholders

C Peterson Credit Shelter Trust
C Peterson Family Trust One
Stefanie S. Peterson
Charlie Ann Letts
Dana K. Thummel
Nickee L. Watson
Dennis N. Peterson

Officers

Chairman of the Board	Patricia A. Peterson
President	Steve Hanson
Vice President	Stefanie S. Peterson
Vice President	Dennis N. Peterson
Treasurer	Dana K. Thummel
Secretary	Nickee L. Watson
Chief Financial Officer	Rick Vitzthum

Parent

Scatter Creek Ltd

Affiliates

Kalama Telephone Company
Tenino Telephone Company
Scatter Creek InfoNet

Indirect Affiliates

Acme Cattle Company
Temporary Fencing of Washington

Dated: February 26, 2024