



Robocall Mitigation Plan

Trenton Telephone Company has fewer than 3000 access lines and Trenton's voice traffic is still over TDM trunks connected via AT&T to the Public Switched Telephone Network (PSTN) ; therefore, Trenton is eligible for the extension of the TRACED Act's requirement to implement STIR/SHAKEN by June 30, 2021.

Respond to Traceback Requests from the Commission, Civil and Criminal Law Enforcement, and the Consortium:

As the Commission states, traceback is an essential tool for determining the source of illegal robocalls. Trenton Telephone Company will respond fully and timely to all traceback requests from the groups listed above. To comply with this response, Trenton Telephone Company will maintain a designated point of contact to handle these requests.

Trenton Telephone Company will employ all tools at its disposal in responding to traceback requests. Trenton Telephone Company uses a Ribbon C15 softswitch for its voice traffic. The C15 allows us to see all calls originating from one of our customers or by transit from a specific trunk coming to one of our customers. The information available on the C15 allows us to see which specific subscriber, specific circuit/trunk member, that call originates or terminates. With this information, we will cooperate fully and timely to any traceback request from the Commission, civil and criminal law enforcement, and the Traceback Consortium. If a request comes from the Commission and/or law enforcement, we will ensure that any such requests are consistent with other legal and regulatory requirements.

Take Steps to Effectively Mitigate Illegal Traffic when Notified by the Commission:

Trenton Telephone Company is fully committed to mitigating illegal traffic within its network and will take decisive action when notified by the Commission of suspected illegal calls or if we detect them through our processes. If a notice is received by the Commission of suspected illegal calls, we will immediately begin an investigation into the traffic in question and determine, to the best of our ability, whether the traffic is in fact illegal robocalls. Results of this investigation will be provided to the Enforcement Bureau. This investigation will include the research and identification of the source of the traffic in questions within our network and the origin of said traffic.

Any investigation will utilize call logs, the C15 call history and customer inquiries as necessary, determine if the traffic is illegal. Trenton Telephone Company will provide the Commission our findings that the identified calls were not illegal and what steps were taken to reach that conclusion. Reasons for a conclusion may vary but might include, for example, verifying that the robocalls were for a legally permitted purpose that the customer has written consent from the called parties

to send such calls. If a Trenton Telephone Company customer claims that its traffic is legal when that traffic has been flagged by the Commission, Trenton Telephone Company will require documented proof of prior express written consent from any called parties. We will refer any callers who believe they have been blocked in error to the Commission for review.

If the investigation determines that the traffic is suspect or, indeed, illegal, Trenton Telephone Company will take steps to mitigate that traffic according to the origin of the traffic on our network. For example, if we are notified about suspect traffic and we determine that the traffic in question entered our network not from a Non-Trenton Telephone Company customer but from an upstream provider, we will inform the Commission of the source of the traffic and contact the upstream provider directly to inform them of the suspect traffic. Trenton Telephone Company will notify the upstream provider that Trenton Telephone Company, in accordance with applicable laws, will to the best of its ability prevent illegal traffic from entering its network, including blocking calls from problem upstream providers identified as a source of illegal robocalls. In the event that a problem upstream provider continues to send illegal robocalls to Trenton Telephone Company's network, we will block that problem provider's traffic until that provider ceases to send illegal robocalls.

If it is determined that the illegal traffic originated from a Trenton Telephone Company customer, we will immediately notify and inform that customer and take steps to prevent the customer from originating illegal robocalls. This can include a variety of mitigating actions, including implementing mandatory account codes for out-dialing; barring calls to local numbers, national numbers, international numbers, or any combination of the three; blocking outgoing calls, incoming calls, or both; and/or severing Trenton Telephone Company's relationship with that customer if no other action solves the problem.

We have in place an agreement with our customers that no illegal activity is to take place involving any of our services. If so, we reserve the right to terminate service immediately. We have an user agreement the customer signs stating this.

Implementing Effective Measures to Prevent New and Renewing Customers from Origination Illegal Calls:

Trenton Telephone Company strongly believes that stopping illegal robocalls is important to protect our customers from potential fraud. Although some robocalls are legal, Trenton Telephone Company strives to ensure that our customers are secure from illegal robocalls.

Trenton Telephone Company is already implementing steps to prevent caller ID spoofing within our network. Our C15 will only allow a customer to originate calls from a number that identifies as the number that has been assigned to said customer. This prevents our customers from originating calls with a spoofed caller ID number. If it is determined that a Trenton Telephone Company customer is attempting to originate a call from a number not assigned to that customer, our switch will block that call from going through. We feel that these measures are the best way that Trenton Telephone Company can prevent illegal robocalls while allowing legal robocalls.

Trenton Telephone Company is a small service provider with less than 100,000 access lines operating in rural, northern Georgia. As a small service provider for over a century, we are familiar with our customers and have trained customer representatives to handle our relationship with customers who are high-volume originators of calls. Trenton Telephone Company maintains call logs and tracks the number and length of calls that travel over all of our trunks. Throughout this review, if it is discovered that any customer is having unusual call behavior by originating excessive calls, or we receive a complaint from a Trenton Telephone Company customer regarding excessive calls, we will then contact that customer to determine whether any suspected illegal robocalling is taking place. We will then take the necessary steps as described above.

Special requirements for Trenton Telephone Company customer call traffic that is determined to be lawful uses will be documented and handled on a case-by-case basis. If necessary, special contracts will be established to clarify the proper use of call origination services and service will be terminated for abuse.

Know your Customer

Trenton Telephone Company thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services.