

Public Telephone Company, Inc Robocall Mitigation Plan

Public Telephone Company, Inc is an interconnected VoIP service provider committed to preventing illegal robocalling on its network. As of October 2025, Public Telephone Company, Inc is fully compliant with the FCC's robocall mitigation requirements under 47 CFR 64.6300 et seq., including the authentication of all originating calls using STIR/SHAKEN protocols. Public Telephone Company, Inc actively monitors and mitigates illegal robocall activity to protect consumers and comply with applicable regulations.

New Customer Screening:

Public Telephone Company, Inc ports existing numbers to trusted providers such as Bandwidth, VoIP Innovations, and Peerless Networks and only originates or terminates calls with Tier 1 carriers, each of whom implements robust robocall mitigation strategies. To prevent illegal robocalling, Public Telephone Company, Inc employs the following measures for new customers:

1. **STIR/SHAKEN Authentication:** All calls originated by new customers are authenticated with STIR/SHAKEN headers, ensuring caller ID integrity and compliance with FCC regulations.
2. **Fraud Detection During Signup:** Systems detect fraudulent patterns during account creation, including non-human call volume indicators and suspicious account activity.
3. **Traffic Monitoring:** Continuous monitoring for traffic congestion or abnormal call volumes from new customers or endpoints.
4. **Immediate Response to Violations:** Complaints from upstream carriers trigger immediate investigation, with call blocking or account termination for customers found to be initiating illegal robocalls.
5. **Service Agreement Compliance:** All customers are required to comply with applicable laws prohibiting illegal robocalling, with clear provisions for service suspension or termination for violations.

Active Customers:

Public Telephone Company, Inc employs advanced analytics and monitoring to prevent illegal robocalling by active customers, including:

1. **STIR/SHAKEN Implementation:** All calls originated on Public Telephone Company, Inc network are authenticated with STIR/SHAKEN headers, ensuring full compliance with FCC requirements and enhancing call traceability.
2. **Automated Monitoring:** Analytics automatically flag and shut down calling patterns indicative of robocalls, including toll fraud and violations of Public Telephone Company, Inc terms of service.
3. **Rate Limiting:** Customers are subject to rate limits, with internal alarms triggered if call volumes exceed thresholds, prompting immediate review.
4. **Service Termination for Violations:** Public Telephone Company, Inc, blocks services for customers using the network for illegal activities, including robocalling, and terminates accounts if violations are determined to be intentional.

Compliance with Government Agencies:

Public Telephone Company, Inc is fully committed to cooperating with law enforcement, the Industry Traceback Group, and other regulatory entities to combat illegal robocalls. Key compliance measures include:

1. **Traceback Cooperation:** Public Telephone Company, Inc promptly responds to all traceback requests, assisting in the investigation and cessation of illegal robocall activity originating on its network.
2. **STIR/SHAKEN Compliance:** Public Telephone Company, Inc authenticates all originating voice traffic with STIR/SHAKEN, ensuring compliance with FCC mandates and enhancing consumer trust in caller ID information.
3. **Robocall Mitigation Program:** All voice traffic on Public Telephone Company, Inc network is subject to a comprehensive robocall mitigation program, incorporating specific and reasonable steps to prevent illegal robocall traffic.

Certification:

Public Telephone Company, Inc certifies that it has implemented a robust robocall mitigation program, including full STIR/SHAKEN authentication for all originating calls, active monitoring, and rapid response to violations. These measures ensure that Public Telephone Company, Inc network is not used to originate illegal robocall traffic, in full compliance with FCC regulations and industry standards.