

Robocall Mitigation Plan

Sherwood Mutual Telephone Association, Inc.

Version 2.0

1. Overview

Pursuant to the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act, the FCC has adopted rules requiring voice service providers to implement STIR/SHAKEN technology in their networks.

The FCC requires that all providers certify in the Robocall Mitigation Database that they have fully implemented STIR/SHAKEN or for those not yet fully compliant to have instituted a Robocall Mitigation program to ensure that they are not originating illegal robocalls as they work to become fully compliant.

The Commission requires voice service providers to develop a Robocall Mitigation plan that:

- Details reasonable steps taken to avoid originating illegal robocalls
- Demonstrates a commitment to respond to traceback requests to cooperate with investigating and stopping illegal robocalls
- Is filed in the Robocall Mitigation Database

Sherwood Mutual Telephone Association, Inc., ("Sherwood") is small voice service providers with fewer than 100,000 voice subscriber lines individually and collectively and as such, exempt from the requirements of 47 CFR 64.6301 through June 30, 2023, per 47 CFR 64.6304.

Sherwood does not operate its own local exchange switch, instead it purchases this switching and interconnection to the PSTN from The Arthur Mutual Telephone Company ("Arthur"). Arthur previously filed its Robocall Mitigation Plan Version 1.0 dated June 28, 2021, in the FCC's Robocall Mitigation Database. The majority of tasks required to mitigate robocalls are the responsibility of the switch provider. As such, Sherwood incorporates Arthur's plan as filed and subsequently revised, and will take all necessary steps to ensure compliance with the plans.

2. Purpose

Implement a plan for Sherwood that complies with TRACED Act.

3. Telephone Number Validation

Sherwood's telephone numbers are assigned in the Arthur central office switch. Sherwood provides Arthur with information on valid, operating telephone numbers to ensure that unassigned numbers are not active in the switch. This information is updated as customers subscribe to or disconnect from Sherwood's local exchange service.

4. Know Your Customer

Sherwood is a long established, small provider that maintains relationships with its customers. Any new customers requesting excessive call paths will be screened for legitimate usage needs.

- Sherwood requires customers provide valid identification including address, service location and credit approval.
- Business customers are required to provide their legal business name and trade names, federal tax ID, nature of business, service location, and credit approval.

5. Monitoring and Investigating Suspicious Traffic

Monitoring will be provided by Arthur as the local switching provider. Arthur uses third-party monitoring system as well as call analytics. When Arthur identifies unusual calling patterns originating from a Sherwood telephone number, Arthur will contact Sherwood. Upon notice, Sherwood will contact the customer to discuss this calling, determine if illegal robocalls are involved, and provide necessary warnings. Sherwood will also have the right to terminate service to the customer if necessary to protect the integrity of the network.

6. Traceback

Sherwood, in tandem with Arthur, commits to cooperate, respond fully and timely to any traceback request from the Commission, ITC (Industry Traceback Consortium) and other valid law enforcement subpoenas and other valid legal processes.

7. Mitigation Plan Revisions

Sherwood will update this plan as conditions change. Arthur, as the local switching and network interconnection provider has committed to the same, and to also update their Robocall Mitigation Plan within ten (10) days of any substantial changes to the current plan. Sherwood will do the same as events require such updates.

8. Know Your Upstream Provider

Sherwood 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.

9. Certification

Sherwood has implemented STIR/SHAKEN authentication in the IP portion of its network. The remaining non-IP network traffic is subject to a deployment extension set forth in 47 CFR § 64.6304(d) as further explained in this document.

Sherwood has not been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation within the last two years due to suspected unlawful robocalling or spoofing.

Sherwood has not been prohibited from filing in the Robocall Mitigation Database.