

Robocall Mitigation Plan

This Robocall Mitigation Plan is submitted by Dunnell Telephone Company, Inc. pursuant to the provisions of 47 C.F.R. § 64.6305, adopted by the Federal Communications Commission (FCC) which require all “voice service providers” to establish a Robocall mitigation plan. This document is the Provider’s current policies and procedures designed to reasonable reduce or eliminate outbound illegal robocalls originating on its network.

The following policies apply to all customers and/or prospective customers of Dunnell Telephone Company, Inc. and comprise our Robocall Mitigation Plan:

Our policy clearly prohibits passing illegal robocalls through any of our switches or networks. Customers who violate these rules are subject to immediate termination. If Dunnell Telephone Company believes illegal traffic has been passed through its network, the customer sending such traffic forfeits confidentiality and all data will be shared with industry partners and law enforcement as required by regulatory bodies.

As a means of preventing or minimizing the origination of illegal robocalls through its voice services, the Provider will use best practices to identity all of its voice service subscribers, whether a residential or business/commercial subscriber. The Provider looks to confirm the identify of customers using its voice services through collecting information such as physical customer location and contact person(s), and the nature of the customer’s business.

The Provider has established a routine process for monitoring of the usage and quality of its network facilities and conducts recurring and timely reviews of its call detail records to facilitate early identification of unusual or suspicious calling activity or patterns that may indicate use of the network for originating illegal robocalls.

Telephone Number Validation is the confirmation of the customer or end-user right to use a telephone number in connection with their subscribed voice service(s). The Provider has procedures in place to confirm the calling customer’s right to use a telephone number.

- single line voice service subscribers, both services connected via TDM or IP, the switching equipment has been set up to only accept calls from the number assigned to that subscriber; and subscribers with multi-line telephone systems, for both services connected via TDM or IP, the Provider screens all originating calls and only allows calls to be connected if the originating number matches one of the numbers assigned to the subscriber. .

The Provider is not currently an international voice services provider. If at any time the Provider does sell its services to customers which are international call originators, it will create and develop best practices for such customers and performing telephone number validation on all international originated calls.

As a rural provider of voice services, the number of upstream providers used by the Provider to receive and deliver its originated voice calls for termination are somewhat limited. The Provider has longstanding relationships with these upstream providers and maintains its awareness of the nature of their businesses and the legitimacy of their call transmission services. The Provider is committed to taking those steps necessary to ensure that any upstream providers providing connectivity are equally committed to monitoring their networks and preventing their use for the transmission of illegal robocalls.

The Provider monitors the usage of its network and examines call detail records on a recurring basis for the purpose of detecting suspicious call activity and/or calling patterns. When network usage patterns consistent with illegal robocalls are detected or the Provider otherwise suspects illegal robocalling or spoofing is taking place on its network, it immediately seeks to identify the party that is originating, terminating, or routing these calls so that it may take appropriate action.