



<http://www.gvtcl.net> 970-257-9045

123 N. 7th St Suite 120
Grand Junction, CO 81501

Robocall Mitigation Plan

Grand Valley Telecommunications, Inc. Headquarters: 123 North 7th St #120 Grand Jct, CO 81501.

Preventative Measures

We perform the following roles in the call chain:

- A voice service provider with a STIR/SHAKEN implementation obligation serving end-users
- A voice service provider with a STIR/SHAKEN obligation acting as a wholesale provider originating calls

Grand Valley Telecommunications, Inc. has not been prohibited from filing a certification in the Robocall Mitigation Database.

Grand Valley Telecommunications, Inc, does not have a history of enforcement actions for illegal robocalls, TCPA or TSR violations, or related state law violations.

Grand Valley Telecommunications, Inc uses the following affirmative, effective measures to prevent the origination or transit of illegal robocalls.

Caller Identification

We follow caller ID authentication best practices for vetting caller identity and operational legitimacy for new and existing customers as described by the NANC Call Authentication Trust Anchor Working Group, including:

Checking robocalls, unallocated calls, and invalid numbers against a pre-existing "Do Not Originate" list

Using reputation scoring (e.g., caller ID analysis/lookup) to determine whether a call likely was executed with malicious intent

Employing block lists and dynamic traffic analysis

This process includes the collection and review of entity-identifying information to confirm that we have an authenticated relationship with the customer (KYC) We use this authenticated information to determine whether the customer is subject to any enforcement actions that restrict the type of calling they may do, such as bans on initiating telemarketing calls.

We also validate, when possible, that the entity has a legitimate right to use its asserted calling numbers. This information supports the attestation level we assign to calls that we originate for that customer.

Our contractual provisions and acceptable use policy with customers prohibit them from initiating illegal robocalls. If we detect a customer initiating suspicious robocalls, we warn them to stop. If such traffic continues, we reserve the right to terminate or suspend their service, while retaining all rights and remedies, including injunctive (restraining) relief.

Upstream Providers

We have a vetting and review process for upstream providers—those that send us voice traffic that we terminate or transit to other providers.

Grand Valley Telecommunications, Inc. utilizes Inteliquent (Sinch) for its STI-AS and STI-VS services

Grand Valley Telecommunications, Inc also utilizes Inteliquent (Sinch) robocall mitigation services. This service scans all TNs coming in, labels them appropriately, and blocks the ones that have a known history of fraudulent activity.

Grand Valley Telecommunications, Inc. has implemented a robocall mitigation program by sending valid CallerID in the SIP From Header and/or the P-Asserted Identity header of every SIP INVITE message that originates from its network. Grand Valley Telecommunications, Inc. is in full control of all CallerID assignments and does not allow a call to originate without a valid CallerID. These messages are sent to upstream trunk carriers:

- o Inteliquent (Sinch)

- o Voip Innovations

We confirm that the upstream provider has a certification in the Robocall Mitigation Database. We will not accept voice traffic from an unregistered provider.

We require that upstream providers have a reasonable robocall mitigation plan, including a vetting process for their customers and upstream providers, and use call analytics to identify suspicious traffic.

We establish an understanding of the upstream provider's role in the call path for the traffic they will send to us, such as whether they are acting as an originating voice service provider, a foreign intermediate provider, or a U.S.-based intermediate provider. This information is used to understand whether we will be obligated to authenticate unsigned traffic that we receive from them.

Our contractual provisions and acceptable use policy with upstream providers are designed to prohibit them from sending illegal robocalls through our network.

Please get in touch with me for any more information that you may require.

Sincerely,

A handwritten signature in blue ink, appearing to read "William Hubbart", with a stylized flourish at the end.

William Hubbart

Ceo – Grand Valley Telecommunications, Inc.