

Sandhills Telecommunications Group, Inc.
SanTel Communications
Robo-Call Mitigation Plan

SanTel is a small CLEC eligible for exemption from STIR/SHAKEN pursuant to 47 CFR §64.6304(d), and 47 CFR §6303(a)(2). Specifically, SanTel is subject to the continuing extension for STIR/SHAKEN under 47 C.F.R §64.6304(d) because it cannot initiate, maintain, carry, process, and terminate SIP calls, but it complies with the requirements of 47 C.F.R. §64.6303(a)(2) in that it only resells non-SIP/non-IP service from AT&T and relies on ATT as our upstream provider since we are only a reseller. The service provided that cannot initiate, maintain, carry, process, and terminate SIP and AT&T participates in an industry standards group that is working to develop a non-Internet Protocol caller identification authentication solution and associated standards.

To the extent SanTel can assist in the effort to reduce robocalls, it has developed and implemented this Robo-Call Mitigation Plan to help reduce robocalls and their harmful effects in accordance with the FCC's efforts to reduce or eliminate robocalls. SanTel only resells ATT POTS lines and does not maintain its network, control calls and relies on ATT to certify and authenticate calls – to the extent it can on a non-SIP network.

Below are the methods implemented by SanTel to mitigate robocalls.

Customer Due Diligence/ Know Your Customer

All existing and renewing customers have been advised of our robocall policy and our goal to block all such activity. Upon renewal of a telephone customer all information concerning the customer is verified.

FLHSI's contractual terms and terms of service permit us to terminate the voice services of any customer that we believe to be a robo-caller.

Measures to Prevent or Avoid the Origination of Illegal Robocalls.

Blocklists are a mechanism SanTel uses to identify and stop illegal robo callers. If we are advised that one of the phone numbers for our customers has been identified as originating fraudulent calls, we will work with ATT to block that and block the call if there is a match.

A customer can also request call blocking feature on their line which we will implement at their request.

SanTel also has a process to report complaints related to Robocall activity as well as to allow customers to provide information related to robo-calls.

Responding to Traceback Requests.

SanTel is fully committed to cooperate with any traceback request we may receive from the Industry Traceback Group (ITG) to the extent SanTel's upstream provider AT&T can comply with the Traceback request. We will use information received from the ITG to maintain the above referenced blocklist.