

Moundridge Telephone Co., Inc.

Robocall Mitigation Plan

Moundridge Telephone Co., Inc. utilizes the below strategies and procedures to ensure compliance and prevention of the origination of robocalls within Moundridge's network.

Know Your Customers

- Moundridge is a well-established provider that maintains a close relationship with its customers. Headquartered in a rural service area, Moundridge knows its customers and understands typical requests for services. Moundridge will not provide services that are suspected to be used in any form of illegal activity.
- All voice services are provided under Nex-Tech's Communications Services Terms and Conditions listed on Nex-Tech's website. These terms advise that under no circumstance shall customer use the services in violation of any applicable laws, statutes, regulations, or tariffs.
- Moundridge educates its customers regarding the required compliance with the terms and conditions of service.
- New customers requesting an excessive number of call paths are screened for legitimate call usage needs.
- Moundridge baselines and customizes thresholds for customers who generate high-volume, legitimate calls such as healthcare facilities, pharmacies, and other validated local businesses.

Monitoring

- Moundridge uses Cordell VQM Version 2.5.8 to monitor outbound calls. Cordell is a division of Moundridge LLC.
- Reports are generated to identify robocalling and are reviewed daily. Moundridge investigates unusual changes in traffic patterns from customers. Suspicious call patterns are investigated immediately. Changes in call patterns can be indicative of robocalling so are, therefore, investigated. Additionally, outbound call pattern changes could be attributed to other illegal activities such as toll fraud.
- Nex-Tech's 24x7 Network Operations Center (NOC) is utilized as part of the robocalling defense plan in monitoring for unusual activity.
- Automated alerts are configured to notify Nex-Tech's NOC of excessive calling or suspicious activity present on Moundridge's outbound network. Nex-Tech's NOC plays a significant role in following up on these alerts.
- The capability is present to customize these alerts and configure them accordingly to limit false positives.
- Voice services are restricted to limit concurrent call counts or call path capabilities.

Take Action

- Moundridge has developed and implemented a detailed internal plan and procedure to notify the proper staff to address any anomalies. In summary, Nex-Tech's 24x7 NOC will notify customers based on unusual call activity, excessive trunk utilization or reports from external parties of a Moundridge customer originating illegal calling activities.
- If any illegal call activity, including robocalling, is observed, the customer will be contacted to discuss and confirm the call activity. If an acceptable response is not received to confirmed illegally originated calls, Moundridge will block those calls until communication with the customer can be

established. Moundridge will not block any calls identified or associated with emergency services or emergency calls.

Traceback Cooperation

- Moundridge will cooperate with traceback requests received directly from carriers, industry associations and law enforcement within 24 hours.
- Moundridge's Chief Technology Officer is designated to investigate robocalling incidents.

Stir/Shaken

- Moundridge is a voice service provider with a STIR/SHAKEN implementation obligation serving end-users and has registered with the STI-PA using OCNs 1808. We have our own STIR/SHAKEN certificate issued by TransNexus STI-CA. We have implemented STIR/SHAKEN using an STI-AS and STI-VS supplied by TransNexus.