



**Hickory Telephone Company**  
**Advanced Telephone Systems, Inc., D/B/A HTC Communications**  
**Robocall Mitigation Plan, Version 3**  
**February 2024**

**Certification**

Hickory Telephone Company, together with its affiliate Advanced Telephone Systems, Inc., D/B/A HTC Communications (“Hickory”) 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.

Hickory 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.

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

**Know Your Customer**

Hickory follows the best practices for vetting caller identify described by the NANC Call Authentication Trust Anchor Working Group.  
(<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

Hickory provided local service to 1,166 customers as of March 2021. Of this total, approximately 90% have only one telephone line. These customers can only make one call at a time as each is provided only one call path for call origination. Moreover, customers can only originate calls from their assigned telephone number which also helps to prevent Robocalling. The combination of low customer count, high percentage of single line customers, and the restriction on outbound calling from an assigned number minimizes the overall risk of Robocalls originating from Hickory’s customers.

The Company will work with its customers that may place legitimate Robocalls to ensure their traffic is not blocked. Examples could include school districts that might Robocall to announce cancellations or delays, or electric utilities that may contact customers to report on network outages.

**Know Your Upstream Provider**

Hickory 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.



### **Traceback**

Hickory responds to all traceback requests from the Commission, law enforcement and the registered traceback consortium and cooperates with such entities in investigating and stopping any illegal robocallers that use our service to originate calls.

The Company's contact for traceback is:

Name: Brian Jeffers  
Title: CEO / Treasurer  
Phone: 724-356-2211  
Email: brian@hky.com

### **Robocall Mitigation Program**

Hickory has committed to a Robocall Mitigation Program for all originating calls made from our network. First, the Company established restrictions on the number of available call paths and originating number authorization. Additional safeguards include proactively monitoring the network for potential Robocall abuses. The Company will block originating calls from customers that have requested their lines be blocked – typically when lines are established exclusively for direct inward dialing. The Company has protocols in place to automatically provide notification if a particular customer exceeds a certain number of calls over a pre-determined period of time. This filing does not identify those thresholds as doing such could provide potential Robocallers with information to circumvent the Company's monitoring system. We will immediately investigate any potential Robocalls or suspicious calls, and if warranted, we will notify the customer to stop originating unlawful calls or terminate their service as appropriate.

Hickory has the tariff authority to terminate customers found to be making Robocalls. The Company's Telephone Tariff Pa. P.U.C. No. 6, Section 1, Sheet 5 states "Service is furnished subject to the condition that it will not be used for an unlawful purpose". This termination can and will be done without advance notice to the violating customer.