

BARAGA TELEPHONE COMPANY ROBOCALL MITIGATION PROGRAM

Baraga Telephone Company is a small/rural carrier eligible for the STIR SHAKEN extension granted to small voice service providers with fewer than 100,000 voice subscriber lines under 47 CFR § 64.6304.

Baraga Telephone Company has implemented the following Robocall Mitigation Plan to detect and prevent unlawful robocalls from originating on its network.

All calls that originate on Baraga Telephone Company's network are subject to the described robocall mitigation program.

Robocall Mitigation Program

Baraga Telephone Company has contracted with a vendor to provide monitoring and reporting systems to analyze high-volume voice network traffic and to identify and monitor patterns consistent with robocalls. The vendor's monitoring systems provide alerts on calling patterns with unusual spikes, traffic patterns, or attempted use of non-validated Telephone Number (TN) to detect patterns consistent with illegal robocalls.

For calls originating from our network, our vendor provides the following Robocall Protection

- Provides detailed reporting identifying suspected illegal robocalls and alerts if calls originate where the calling number is invalid, unallocated, on a Do-Not-Originate list.
- If the platform detects suspected robocalling patterns Baraga Telephone Company will take appropriate action which may include suspending or terminating the subscriber.
- Supports a real time query to service to determine if a number originating on your network could be a robocall. Such calls can be blocked, or the terminating party can be notified via CNAM.
- For each new instance of robocalling using the Operating Service Provider (OSP) TNs, an alert is sent to the OSP in near real time. This alert will result in the OSP (manually) blocking the TN and all TSPs being alerted via CNAM, through an overlay such as "ROBOCALLER". CNAM alerting helps address instances of spoofing of TNs that are not going through the OSP that owns the number.

If Baraga Telephone Company is notified of traffic patterns consistent with illegal robocalls, or we have reason to suspect illegal robocalling or spoofing is taking place over our network, we will seek to identify the party that is using our network to originate, route, or terminate these calls and take appropriate action.

Appropriate action may include:

- Validating that the originating party is authorized to use the TN.
- Suspending calling party's ability to originate, route, or terminate calls on Baraga Telephone Company's network.

Baraga Telephone Company has contracted with Neustar to provide monitoring and reporting systems to analyze voice traffic and identify patterns consistent with robocalls.

Know Your Customer

Baraga Telephone Company vets the identity of new subscribers to [prevent originating illegal calls, before they are placed by the collecting the following information.

- Individual Subscriber
 - o Photo ID
 - o Driver's License Number, if applicable
 - o Social Security Number, if applicable
- Business Subscriber
 - o Account Manager Information
 - o Tax ID, if applicable
 - o Physical Location

Our contract with customers prohibits them from initiating illegal robocalls. If we find a customer initiating suspicious traffic, we warn them to stop. If such traffic continues, we reserve the right to terminate their service.

Know your upstream provider

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 monitor traffic from upstream providers and prohibit them from sending us illegal robocalls. If we find an upstream provider initiating suspicious traffic, we warn them to stop. If such traffic continues, we reserve the right to terminate their traffic.

STIR/SHAKEN

We have registered with the STI-PA and have our own STIR/SHAKEN certificate, issued by Ribbon STI Certification Authority (STI-CA) that we use when authenticating calls that we originate. We have implemented a STIR/SHAKEN solution from Ribbon.

We are exempt from STIR/SHAKEN implementation for some calls, because they rely on non-IP technology. 47 CFR 64.6304(d)

Traceback Cooperation

Baraga Telephone Company commits to responding in a timely manner and supporting all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG).