

Robocall Mitigation Plan for FIRST TELE COMMUNICATIONS

The following document outlines the Robocall Mitigation Plan for First Tele Communications, which will be submitted to the Federal Communications Commission's (FCC) Robocall Mitigation Database. This comprehensive plan is designed to help combat illegal robocalls by implementing robust monitoring and reporting mechanisms while complying with the most up-to-date laws, regulations, and best practices established by the telecommunications industry and regulatory bodies. FIRST TELE COMMUNICATIONS remains committed to adjusting and enhancing this plan as necessary to address emerging challenges and to align with evolving regulatory standards.

We use software provided by TransNexus to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts us if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. We immediately investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If we determine that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as appropriate.

Monitoring and Reporting Systems

At FIRST TELE COMMUNICATIONS, we have implemented a series of advanced monitoring systems to detect and track abnormal voice network traffic patterns indicative of robocalling activity. Our systems are specifically designed to continuously analyze high-volume traffic across our voice networks. This proactive monitoring enables us to identify traffic patterns that deviate from normal usage, including unusual spikes in call volumes and attempts to use unverified or invalid Telephone Numbers (TNs). These automated systems are essential in detecting and flagging activities that are consistent with illegal robocall practices.

Our monitoring systems provide real-time alerts whenever suspicious calling patterns emerge. These alerts are triggered by anomalies such as an unexpected surge in call volumes, patterns that resemble robocall activities, or the use of unvalidated or fraudulent TNs. By identifying these issues early, we can take swift action to investigate and mitigate potential risks to our network and to consumers.

Responding to Suspicious Activity

In the event that our monitoring systems detect patterns consistent with illegal robocalls or if we have any reason to suspect that robocalling or spoofing is taking place over our network, we will take immediate steps to identify the responsible party. The first step in this process is to trace the source of the suspicious activity, which may involve locating the party originating, routing, or terminating these calls within our network.

Once we identify the entity responsible for the suspicious traffic, we will take appropriate and decisive actions to prevent further illegal activity. These actions may include, but are not limited to:

1. **Validating the Authorized Use of the TN:** We will confirm whether the originating party is authorized to use the TN in question. If the TN is being used fraudulently or without proper authorization, we will take steps to revoke or suspend its usage immediately.

2. **Suspension of Call Origination, Routing, or Termination:** If necessary, we will suspend the calling party's ability to originate, route, or terminate calls through our network. This measure will be implemented to prevent further illegal activity and to protect consumers from the harms caused by robocalls and spoofing.

FIRST TELE COMMUNICATIONS remains vigilant in its commitment to prevent illegal robocalling activities and ensure compliance with all regulatory requirements. Our Robocall Mitigation Plan will continue to evolve as new technologies and practices emerge, ensuring that we remain proactive in our efforts to safeguard both the integrity of our network and the interests of consumers.

Know Your Customer

First Tele Communications Inc is fully aware of all the carriers from which it receives traffic and has verified that each carrier with which it exchanges or receives traffic is properly listed in the Robocall Mitigation Database. The company collects essential identification details for all of its upstream providers, including their physical business locations, designated contact persons, state of incorporation, and the nature of their business. Moving forward, all interconnection agreements will incorporate clauses addressing prohibited traffic and specifying traceback procedures.

Traceback

We respond to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls within 24 hours.

STIR/SHAKEN Extensions

We have complete STIR/SHAKEN implementation, and all calls are compliant with 47 CFR § 64.6302(b).