



Robocall Mitigation Plan

STIR/SHAKEN Extensions

We are eligible for and are taking STIR/SHAKEN implementation extension received under 47 CFR § 64.6304 because we have fewer than 100,000 voice subscriber lines.

Green Hills is eligible for the continuing extension of the STIR SHAKEN implementation deadline on Non-IP networks as a small voice service provider (§64.6304 (a)(2) that has non-IP portions within its network §64.6304(d).

Green Hills provides local service to fewer than 100,000 voice subscriber lines. Some Green Hills customers are served on the non-IP portions of our network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

All the voice traffic that originates on our network is subject to the robocall mitigation program described below.

Robocall Mitigation Program

Green Hills has contracted with Transnexus to provide call analytics on the Green Hills network traffic. 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. We also extensively investigate new customers seeking access to high-volume origination services to determine if a potential robocall situation exists. We take reasonable and effective steps to ensure that the immediate upstream provider is not using our network to carry or process a high volume of illegal traffic by exercising due diligence before accepting traffic from an upstream provider.

Know Your Customer

We follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>) These practices include subscriber vetting, telephone number validation, A, B,

and C level attestation, third-party validation, international call validation, and continuous monitoring of subscriber traffic patterns.

Traceback

Green Hills commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping illegal robocallers that use its service to originate, carry, or process illegal robocalls.

Know Your Upstream Providers

Green Hills knows all the carriers from which it receives traffic and has confirmed that all the carriers are listed in the Robocall Mitigation Database. No provider is using the Green Hill network to carry or process a high volume of illegal traffic. Green Hills monitors incoming traffic from all connected carriers for suspicious call patterns indicative of illegal robocall activity. The connected carriers are made aware of any suspicious or illegal traffic and notified that, if the traffic does not cease, the calls may be blocked from entering the Green Hills network. In addition, Green Hills is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.

Principals, Affiliates, Subsidiaries, and Parent Company Information

Green Hills Telephone Corporation (GHTC), with FRN 0003736238, is a telecommunications cooperative operating in the state of Missouri. GHTC is the parent company and exercises management or control for the following one hundred percent, wholly-owned subsidiaries in the Robocall Mitigation Database:

- Citizens Long Distance Company (FRN 0003730678)
- Citizens Telephone Company of Higginsville, Missouri (FRN 0002504298)
- Green Hills Area Cellular Telephone, Inc. (FRN 0003736253)
- Green Hills Communications, Inc. (FRN 0003736246)

Principals that exercise control over the above entities are: David Misel (President), Roy Thomas (Vice-President), Jeff Riley (Secretary), and David Adams (Executive Vice-President and General Manager).