

South Central Communications – Telecom Services, LLC ROBOCALL MITIGATION PLAN

South Central Utah Telephone Association, Inc. is the parent company of South Central Communications-Telcom Services. South Central Utah Telephone Association, Inc. is the 100% owner and manager of its subsidiary South Central Communications – Telecom Services, LLC. Michael R. East serves as CEO of South Central Communications – Telecom Services, LLC. South Central Communications, Inc. is a sister company to South Central Communications – Telecom Services, LLC. South Central Communications – Telecom Services, LLC has no ownership interest in South Central Communications, Inc. Both South Central Communications-Telcom Services, LLC and South Central Communications, Inc (dba South Central Communications, Inc. and SC Broadband) are subsidiaries and 100% owned and managed by South Central Utah Telephone Association, Inc.

South Central Communications – Telecom Services, LLC (South Central), Operating Company Number 380F, is eligible for the continuing STIR SHAKEN implementation deadline under FCC rules § 64.6304(a)(2) and §64.6304(d) - Extension of Implementation Deadline. South Central qualifies for the continuing extension of the STIR SHAKEN implementation deadline as a small voice service provider (§64.6304 (a)(2)) that has non-IP portions within its network (§64.6304(d)).

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

As required to meet the non-IP network criteria for the continuing extension and consistent with § 64.6303 (a)(2), South Central is a member of NTCA and NTCA participates on the ATIS Non-IP taskforce working group which developed the (ATIS solutions) non-IP call authentication solutions. NTCA is serving as South Central's third-party representative on the ATIS non-IP taskforce working group.

As required to meet the non-IP network criteria for the continuing extension and consistent with § 64.6303 (a)(1), South Central has contacted all of its connected carriers and requested to convert the non-IP connections to IP connections. Several of our connecting carriers have stated they cannot support IP connections at this time.

South Central also originates calls via SIP connections within its network. South Central has registered with the Policy Administrator and is an authorized service provider in the STIR|SHAKEN ecosystem. South Central has implemented STIR|SHAKEN within its network and signs the calls originating on the IP portions of South Central's network.

Robocall Mitigation Plan:

All voice traffic that originates on South Central's network is subject to the following Robocall Mitigation Plan.

All originating traffic on South Central's network is routed through the TransNexus ClearIP service. This system uses call analytics to identify and monitor voice traffic consistent with illegal robocall campaigns and fraudulent calls.

The TransNexus ClearIP service also monitors call origination volume on customer lines and takes mitigation steps if a threshold volume is exceeded. Robocall mitigation takes place through this service automatically with no manual intervention required on the part of South Central Utah Telephone Association.

Investigation

South Central investigates calls identified by TransNexus as suspicious calls or those that have abnormal call volumes, patterns or activity consistent with illegal robocalls.

In addition, if South Central has any other reason to suspect illegal robocalling or spoofing is taking place over its network, South Central will work internally to identify the party that is using our network to originate, route, or terminate such calls and take appropriate action.

Enforcement

Illegal robocalls and fraudulent caller ID spoofing are prohibited on our network. If it is determined a South Central customer is using our network to fraudulently spoof calls or to originate illegal robocalls, South Central will either warn the customer to stop such practices or terminate their service as allowed per South Central policy.

Know Your Customer

South Central has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. South Central thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services.

All end users receive access to the South Central Utah Telephone Association Terms of Service agreement when new service is activated or existing service is renewed. The Terms of Service arrangement includes notice that South Central prohibits use of its network for the initiation of fraudulent spoofing and robocalls. If end users are found in violate of the service terms, the end user's service may be terminated.

Know Your Upstream Providers

South Central knows all carriers in which it exchanges traffic. South Central, via the TransNexus Clear IP solution, proactively 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 identified and notified, that if the traffic does not cease, the calls may be blocked, upon customer request, from entering South Central's network to terminate.

South Central has confirmed that all carriers in which South Central exchanges traffic and from which South Central receives traffic are listed in the Robocall Mitigation Database.

South Central has reviewed the connected carrier's Robocall Mitigation Plans to learn how the carriers monitor their originating traffic to mitigate illegal robocalls.

Role In the Call Chain

South Central is a voice service provider with a STIR/SHAKEN implementation obligation on the IP-Portions of its network. South Central is also a voice service provider without a STIR/SHAKEN obligation on the non-IP portions of its network because that portion of South Central's network relies on technology that cannot initiate, maintain, carry, process, or terminate SIP calls.

Traceback

South Central commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to originate calls. South Central will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium fully and in a timely manner within twenty-four (24) hours.

Robocall Mitigation Database Eligibility

South Central has not been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling.

South Central has not been prohibited from filing in the Robocall Mitigation Database (RMD).