



Santa Rosa Communications, LLC. Robocall Mitigation Plan

Santa Rosa Communications, LLC. is a non-facilities-based reseller of long-distance service (non-gateway intermediate provider). Our wholesale network provider is Sinch. This Robocall Mitigation Plan describes the specific reasonable steps that Santa Rosa Communications has taken to avoid the carrying or processing of illegal robocall traffic on our wholesale provider's network.

“Know-Your-Upstream Provider” Procedures

Santa Rosa Communications only offers long distance service to the customers of its local exchange carrier affiliate, Santa Rosa Telephone Cooperative, Inc. Therefore, Santa Rosa Communications knows very well the only upstream provider from which it receives traffic.

Use of Call Analytics Systems

Santa Rosa Communications is a non-facilities-based reseller of long-distance service. Santa Rosa Communications only receives traffic from its local exchange carrier affiliate, Santa Rosa Telephone Cooperative, Inc. Santa Rosa Telephone Cooperative, Inc. uses Carrier Management Systems' NAMS Firefly solution to monitor voice traffic on its network for calling patterns consistent with illegal robocall campaigns and fraudulent calls.

Commitment to Respond to Traceback Requests

Santa Rosa Communications 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.