

CHICKASAW LONG DISTANCE ROBOCALL MITIGATION PLAN

Chickasaw Long Distance is a non-facilities based reseller of long-distance service (non-gateway intermediate provider). Our wholesale network provider is [ANI Networks](#). This Robocall Mitigation Plan describes the specific reasonable steps that Chickasaw Long Distance has taken to avoid the carrying or processing of illegal robocall traffic on our wholesale provider's network.

“Know-Your-Upstream Provider” Procedures

Chickasaw Long Distance only offers long distance service to the customers of its local exchange carrier affiliates, Chickasaw Telephone Company (“CTC”) and Chickasaw Telecommunications Services, Inc. (“CTSI”). Therefore, Chickasaw Long Distance knows very well the two upstream providers from which it receives traffic.

Use of Call Analytics Systems

Chickasaw Long Distance is a non-facilities based reseller of long distance service and therefore relies, in part, on the call analytics systems of its wholesale provider, ANI Networks.

In addition, Chickasaw Long Distance only offers long distance service to the customers of its local exchange carrier affiliates, CTC and CTSI. CTC and CTSI use Neustar-TransUnion for Robocall Mitigation. The Portal uses Fraud Threshold Management, Robocall Mitigations Preference, Deny and Allow Lists, Fraud Alerts and Reports of high runner/calls. These features block, direct and warn the called party based on the Robocall Mitigation score and Robocall Mitigation response category. Also has a custom allow and deny list, shows telephone numbers originating from our network that are suspected robocalls and has standard reports to show daily high-runner reports.

Commitment to Respond to Traceback Requests

Chickasaw Long Distance 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.