

Mud Lake Telephone Cooperative Association, Inc. Robocall Mitigation Program

This Robocall Mitigation Plan describes the specific reasonable steps Mud Lake Telephone Cooperative Association, Inc. (Mud Lake) has taken to avoid the origination, carrying, or processing of illegal robocall traffic. Mud Lake relies upon Syringa Networks, LLC for the switching of all calls originated by Mud Lake's customers.

Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Calls

Mud Lake has a "know-your-customer" policy through which we exercise due diligence in ensuring that our services are not being used to originate illegal traffic. Specifically, for new and renewing customers, Mud Lake:

- Confirms the customer's identity and, if it is a business, its incorporation documents.
- Confirms the customer's service address.
- Verifies customer information when contracts are renewed or services are added.
- Verifies the customer's identity and their right to use the telephone number presented on calls.

Although Mud Lake's customers generally do not generate a high volume of calls, were Mud Lake to receive a request for high-volume origination services, it would exercise caution and extensively investigate the requesting entity before granting access to the services.

In addition, Mud Lake has an enforceable terms of use and/or acceptable use policy that defines the circumstances by which it will deny, suspend, or terminate service to a customer.

"Know-Your-Upstream Provider" Procedures

Mud Lake relies upon the "know-your-upstream provider" procedures of its host switching provider, Syringa Networks, LLC. It is Mud Lake's understanding that Syringa's upstream providers are AT&T, Verizon Business (WorldCom, MCI), Verizon Wireless, and Lumen (Qwest, WilTel). Mud Lake is confident that Syringa Networks knows these upstream providers very well and exercises due diligence before accepting traffic from any new upstream provider.

Use of Call Analytics Systems

Mud Lake uses Transaction Network Services (TNS) Call Guardian analytics technologies and services to monitor traffic on its network and identify potentially unlawful call origination activity. If Mud Lake has a reasonable basis to believe that a customer is originating illegal

robocalls, it will require the customer to remedy the problem. If effective action is not taken, Mud Lake will suspend and/or terminate the customer's service.

In addition, Mud Lake has deployed call authentication, call labeling, and call blocking services provided by TNS.

Mud Lake blocks the following types of calls by default:

- Calls originating from invalid numbers.
- Calls from numbers on a reasonable Do-Not-Originate list.

Commitment to Respond to Traceback Requests

Mud Lake 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 services to originate, carry, process illegal robocalls.