

The Chillicothe Telephone Company ROBOCALL MITIGATION PLAN

The Chillicothe Telephone Company (Chillicothe) is eligible for the continuing extension of the STIR/SHAKEN implementation for Non-IP Networks 64.6304 (d), we comply with 64.6303 (a) (2) as a participant in the ATIS Non-IP Call Authentication (NIPCA) Task Force. The assigned Operating Company Number is 0597.

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

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

Robocall Mitigation Plan

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

Call Analytics

Chillicothe has contracted with TransNexus to provide robocall analytics and reputation scoring of Chillicothe's network outbound traffic. The vendor uses software to monitor outbound voice traffic in real time and provides detailed reporting identifying if Chillicothe's network originates 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. Chillicothe has access to the vendor's portal and receives daily notifications about telephone numbers originating suspected illegal robocalls on its network. The software's identification of suspected illegal robocalls and alerts helps prevent the origination of illegal robocalls.

Chillicothe blocks the origination of calls from unassigned telephone numbers out of its assigned NPA-NXX inventory and calls originating from numbers that are not valid NANP numbers.

Investigation

Chillicothe 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 Chillicothe has any other reason to suspect illegal robocalling or spoofing is taking place over its network, Chillicothe will work internally to identify the party that is using Chillicothe's network to originate, route, or terminate such calls and take appropriate action.

Enforcement

Illegal robocalls and fraudulent spoofing is prohibited on Chillicothe's network. If it is determined, a Chillicothe customer is using its network to fraudulently spoof calls or to originate illegal robocalls, Chillicothe will warn the customer to stop such practices or terminate their service.

Know your Customer

Chillicothe conducts reasonable due diligence on new and renewing customers in order to protect its own business interests. These measures include confirming the customer's service address, collecting id information and obtaining a valid tax identification number before initiating service.

Chillicothe's network only allows the origination of calls from telephone numbers that are assigned by or ported to Chillicothe. Chillicothe also uses Transnexus ClearIP analytics technologies and services to monitor traffic on its network and identify potentially unlawful call origination activity.

Upstream Provider Knowledge

Chillicothe knows all the carriers from which it receives traffic and has confirmed that all of the carriers are listed in the Robocall Mitigation Database. Chillicothe has also 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

Chillicothe is a voice service provider with a STIR/SHAKEN implementation obligation on the IP-Portions of its network. Chillicothe is also a voice service provider without a STIR/SHAKEN obligation on the Non-IP portions of its network because that portion of the network relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls. In addition, Chillicothe is a non-gateway intermediate provider without a STIR/SHAKEN obligation as Chillicothe does not transit SIP calls between carriers.

Traceback

Chillicothe commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that Chillicothe determines are using Chillicothe's service to originate calls. Chillicothe commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium within 24 hours.

Robocall Mitigation Database Eligibility

Chillicothe has not, within the prior two years, been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling.

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

Legal Structure as of December 31, 2025

