



Sierra Telephone Long Distance Robocall Mitigation Plan

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

"Know-Your-Upstream Provider" Procedures

STLD only offers long distance service to the customers of its local exchange carrier parent company, Sierra Telephone Company, Inc. (Sierra Telephone). Therefore, STLD knows very well the only upstream provider from which it receives traffic.

Use of Call Analytics Systems

STLD is a non-facilities based reseller of long distance service and therefore relies, in part, on the call analytics systems of its wholesale provider, [REDACTED].

In addition, STLD only receives traffic from its local exchange carrier affiliate company, Sierra Telephone. Sierra Telephone has employed the [REDACTED]

[REDACTED] The profiles differentiate legitimate users from abusive, fraudulent and/or unlawful users.

In addition, Sierra Telephone has taken measures to prevent caller ID spoofing from occurring on its network by utilizing the [REDACTED]. Subscribers in the switch can originate calls from their phone line only using the caller ID that is assigned to that line. If the caller ID does not match the line from which the call is originating, the call will not be connected.

Commitment to Respond to Traceback Requests

STLD 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.