



Infinite
Innovation

Vision Net
1309 NW Bypass,
Great Falls, Montana
59404

Robocall Mitigation Plan

This is the robocall mitigation plan for Vision Net, Inc. (Vision Net), headquartered at 1309 NW Bypass, Great Falls, Montana 59404.

We perform the following role in the call chain:

A non-gateway intermediate provider without a STIR/SHAKEN obligation.

Vision Net has not been prohibited from filing a certification in the Robocall Mitigation Database and has no history of enforcement actions for illegal robocalls, TCPA/TSR violations, or related state law violations. We are committed to helping stop illegal robocalls.

Vision Net uses the following affirmative, effective measures to prevent the transit of illegal robocalls.

Know Your Upstream Provider

We have a vetting and review process for upstream providers that send us voice traffic that we transit to other providers.

We confirm that the upstream provider has a certification in the Robocall Mitigation Database. We will not accept voice traffic from an unregistered provider.

We require that upstream providers have a reasonable robocall mitigation plan, including a vetting process for their customers and upstream providers, and use call analytics to identify suspicious traffic.

We establish an understanding of the upstream provider's role in the call path for the traffic they will send to us, for example, whether they are acting as an originating voice service provider, a foreign intermediate provider, or a U.S.-based intermediate provider. We use this information to understand whether we will be obligated to authenticate unsigned traffic that we receive from them. Vision Net does not directly transit any traffic for foreign intermediate providers or foreign voice service providers. Vision Net is a non-gateway intermediate provider.

Our contractual provisions with upstream providers will prohibit them from sending us illegal robocalls. If we find that an upstream provider is sending us suspicious robocalls, we warn them to stop. If such traffic continues we will terminate their service.

Traceback

Vision Net will respond within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium. We will cooperate fully with such entities in investigating and stopping any illegal robocallers that use our service to carry or process illegal robocalls.

Robocall Mitigation Program

Vision Net does not originate any calls. We use call analytics software provided by TransNexus to monitor all outbound voice traffic in real-time to prevent the transit of illegal robocalls.

The software provides detailed reporting to identify suspected illegal robocalls. The system alerts us if we process outbound calls where the calling number has a poor reputation or is invalid, unallocated, or on a Do Not Originate list.

Principals, Affiliates, Subsidiaries, and Parent Companies

Vision Net's principal is Robert Worden, CEO.

Vision Net is owned by the following rural Montana and Wyoming communication companies providing some or all of them with SS7 signaling and/or connections to major long distance carriers via TDM.

- FRN 0001646454 - 3 Rivers Telephone Cooperative, Inc. d/b/a 3 Rivers Communications
- FRN 0006301592 - InterBel Telephone Cooperative, Inc.
- FRN 0001647734 - Lincoln Telephone Company, Inc.
- FRN 0001646470 - Nemont Telephone Cooperative, Inc.
- FRN 0004331724 - Northern Telephone Cooperative, Inc.
- FRN 0008308405 - Range Telephone Cooperative Inc.
- FRN 0001648039 - Southern Montana Telephone Company
- FRN 0003729316 - Triangle Telephone Cooperative Association, Inc.

STIR/SHAKEN

We are exempt from STIR/SHAKEN implementation requirements for all calls because these calls rely on non-IP technology - 47 CFR 64.6304(d). Vision Net understands it will need to implement STIR/SHAKEN once an industry standard is adopted for non-IP technology and is working with TransNexus in preparation.