

Pine Belt Cellular, Inc.

Robocall Mitigation Plan

This Robocall Mitigation Plan is for Pine Belt Cellular, Inc. (“Pine Belt”), with headquarters at 3984 County Road 32, PO Box 279, Arlington, AL 36722.

We perform the following role in the call chain: A voice service provider with a STIR/SHAKEN implementation obligation serving end-users.

Pine Belt has not been prohibited from filing a certification in the Robocall Mitigation Database.

Pine Belt does not have a history of enforcement actions for illegal robocalls, TCPA or TSR violations, or related state law violations.

Pine Belt uses the following affirmative, effective measures to prevent the origination or transit of illegal robocalls. Pursuant to 47 C.F.R. § 64.6305, Pine Belt implemented its Robocall Mitigation Plan (“Plan”) as of June 30, 2021. Pine Belt has updated its Plan as of February 20, 2025, in order to comply with current FCC Rules. Because Pine Belt sends all outgoing traffic over the Sinch America, Inc. (“Sinch”) network, Pine Belt also relies on the procedures, policies, and safeguards implemented by Sinch to ensure that Pine Belt’s customers are sufficiently protected against robocall activities. Pine Belt may modify, add, delete or otherwise alter any of the provisions of the Plan at any time in order to respond to changes in its business, changes in its network capabilities, and its needs to protect its customers and network, all of which Pine Belt will evaluate periodically, as well as may be necessary to comply with any modifications to FCC Rules.

Pine Belt is a small rural wireless service provider of voice and broadband service in rural Alabama. Pine Belt’s customers generally do not originate high volume calls, and Pine Belt has not received information suggesting that robocalls have been originated on its network. Pine Belt considers its network at a very low risk of originating illegal robocalls.

Know Your Customer

To the best of its ability, Pine Belt believes it follows best practices for vetting the caller identity and operational legitimacy for new and existing subscribers, consistent within practical limitations, as described by the NANC Call Authentication Trust Anchor Working Group. Pine Belt examines all new and renewing customers, confirming the identity of the customer, including confirming the customer’s service address. Pine Belt verifies customer’s credit history and business reputation prior to providing service. Pine Belt verifies customer information when contracts are renewed or services are added. Pine Belt verifies the customer’s identity and their right to use the telephone number presented on calls. Pine Belt uses all of this customer information to determine whether the customer is subject to any enforcement actions that restrict the type of calling that they may do, for example, if they have been banned from initiating telemarketing calls. Pine Belt also uses this information to support the attestation level we assign to calls that we originate for that customer.

Pine Belt maintains close personal knowledge of the needs of its customer base and it has in-person customer service agents in all of its service areas. Pine Belt's standard customer service agreement and Pine Belt's policies prohibit uses and activities involving the services that are illegal and define the circumstances by which it will deny, suspend or terminate service to a customer, including if a user breaches the customer service agreement. If a Pine Belt customer is found to be originating illegal robocalls, Pine Belt clearly has the right to terminate that customer's services. If we find a customer initiating suspicious robocalls, we warn them to stop. If such traffic continues, then we terminate their service.

Know Your Upstream Provider

We have a vetting and review process for upstream providers, that is, providers that send us voice traffic that we terminate or 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. Pine Belt does not receive any traffic from foreign intermediate providers. All incoming traffic to Pine Belt is received over SIP trunks from Sinch and Pine Belt does not receive any unsigned SIP traffic.

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

Traceback

Pine Belt responds within 24 hours to all traceback requests received from the Commission, law enforcement, and the registered traceback consortium. We cooperate fully with such entities in investigating and stopping any illegal robocallers that use Pine Belt's service to originate, carry, or process illegal robocalls.

Robocall Mitigation Program

Pine Belt uses call analytics software provided by TransNexus, specifically the Clear IP software platform, to monitor all outbound voice traffic in real-time to prevent the origination or 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. We perform the same mitigation steps for all outbound calls regardless of our role in the call chain for a particular call.

We immediately investigate any identified suspicious calls to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls. If we determine that the traffic was likely unlawful, then we warn them to stop sending such traffic. If they continue to send traffic that appears to be unlawful, then we terminate their service.

STIR/SHAKEN Implementation

All calls on Pine Belt's network are initiated, maintained, and terminated as SIP calls and Pine Belt has implemented the STIR/SHAKEN authentication framework in its Internet Protocol ("IP") network. Accordingly, Pine Belt has certified under Option 1 that it is fully STIR/SHAKEN compliant. The voice traffic on Pine Belt's network is authenticated using TransNexus STIR/SHAKEN products and services, specifically the Clear IP software platform. 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.

We have registered with the Secure Telephone Identity-Policy Administrator ("STI-PA") using OCN 4260. We have our own STIR/SHAKEN certificate issued by the TransNexus Certification Authority (STI-CA) that we use when authenticating calls we originate. We have implemented a STIR/SHAKEN solution supplied by TransNexus.

Updated February 20, 2025