



Robocall Mitigation Plan

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

"Know-Your-Upstream Provider" Procedures

Ponderosa Cablevision only offers long distance service to the customers of its local exchange carrier parent company, The Ponderosa Telephone Company. Therefore, Ponderosa Cablevision knows very well the only upstream provider from which it receives traffic.

Use of Call Analytics Systems

Ponderosa Cablevision is a non-facilities based reseller of long distance service and therefore relies, in part, on the call analytics systems of its wholesale provider, Sinch.

In addition, Ponderosa Cablevision only receives traffic from its local exchange carrier parent company, The Ponderosa Telephone Company. The Ponderosa Telephone Company uses software provided by TransNexus/ClearIP to monitor its outbound voice traffic in real time to prevent the origination and transit of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls. The system alerts us if we originate any calls where the calling number is invalid, unallocated, or on a Do Not Originate list; in the FCC consumer complaint database; or has a poor reputation. We immediately investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If we determine that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as appropriate.

Commitment to Respond to Traceback Requests

Ponderosa Cablevision commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate, carry, or process illegal robocalls.

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Principals, Affiliates, Subsidiaries, and Parent Companies

Ponderosa Communications, Inc.
Stageline Communications, Inc.
Table Top Telephone Company, Inc.
Tularosa Basin Telephone Company, Inc.
Tularosa Communications, Inc.
Ponderosa Broadband, LLC.

Ponderosa Cablevision – Board Members

President - Kristann Silkwood-Mattes
Frank Bigelow - Vice-President
Matthew C Wagner – Secretary/Treasurer
Jennifer Burkhalter - Chief Financial Officer
Matthew J Bigelow – Vice President
Shyann E Mattes – Vice President