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Ballard Rural Telephone Cooperative Corporation, Inc. Robocall Mitigation Plan

This Robocall Mitigation Plan describes the specific reasonable steps that Ballard Rural Telephone Cooperative Corporation, Inc. (“BTC”) has taken to avoid the origination, carrying, or processing of illegal robocall traffic on its network.

Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Calls

BTC has a “know-your-customer” policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. Prior to a new business customer ever making a call on BTC’s network, we personally know, or get to know, the business owners and/or management. This personal touch gives BTC a clear view of whether or not the business presents a risk for originating illegal robocalls.

Although BTC’s customers generally do not generate a high volume of calls, were we to receive a request for high-volume origination services, we would exercise caution and extensively investigate the requesting entity before granting access to the services. Specifically, BTC would collect information such as their physical business location, contact person(s), state or country of incorporation, federal tax ID, and the general nature of their business.

“Know-Your-Upstream Provider” Procedures

The few connections that BTC has with upstream providers have been in place for many years, and we know these companies very well. (BTC’s primary immediate upstream provider is AT&T.) Before accepting traffic from any new upstream provider, BTC would exercise due diligence and seek to ensure that the provider is not using BTC to carry or process a high volume of illegal traffic. Specifically, BTC would collect information such as the upstream provider’s physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of their business.

Use of Call Analytics Systems

BTC uses Transaction Network Services (TNS) Call Guardian analytics technologies and services to monitor traffic on its network and identify potentially unlawful call origination activity. If BTC has a reasonable basis to believe that a customer is originating illegal robocalls, we will require the customer to remedy the problem. If effective action is not taken, BTC will suspend and/or terminate service to the customer.

In addition, BTC has deployed call authentication, call labeling, and call blocking services

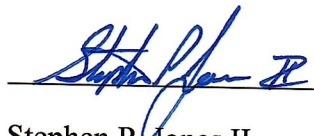
provided by TNS. BTC blocks the following types of calls by default:

- Calls that purport to be from invalid, unallocated, or unused numbers.
- Calls from phone numbers on a Do-Not-Originate list.

Commitment to Respond to Traceback Requests

BTC 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 services to originate, carry, process illegal robocalls.

Signature:

A handwritten signature in blue ink, appearing to read "Stephen P. Jones II", is written over a horizontal line.

Name: Stephen P. Jones II

Title: Information Technology Network Manager

Date: April 11, 2024