

Hanson Communications Inc.

Federal Communications Commission Robocall Mitigation Plan

Updated: Oct 11, 2024

Robocall Mitigation Plan Introduction

Consistent with the rules and regulations of the Federal Communications Commission (“FCC” or “Commission”), the following Robocall Mitigation Plan details the policies and practices that Hanson Communications Inc. and its affiliates, (“Hanson”) have established to avoid originating illegal robocall traffic and avoid carrying or processing illegal robocall traffic. This Robocall Mitigation Plan applies to all of Hanson’s calling platforms—including both the IP and TDM portions of the network.

Company Summary

Hanson Communications, Inc. is a holding company headquartered in Willmar, MN. The Company has multiple affiliates that are covered under this Robocall Mitigation Plan. Consistent with the Robocall Mitigation Database (“RMD”) filing instructions, Hanson is submitting information regarding its “Other FCC Registration Numbers,” “Other DBA Names,” and “Previous Business Names.” The principals of Hanson and company information for all of Hanson can be found on **Exhibit A** of this Robocall Mitigation Plan.

Hanson is essentially a voice service and broadband provider with a STIR/SHAKEN implementation obligation serving end-users. Hanson is not a foreign voice service provider.

- Hanson provides voice service to a broad range of residential, commercial, and enterprise customers across its Internet Protocol (“IP”) and time division multiplexing (“TDM”) networks as both a competitive local exchange carrier (“CLEC”) and incumbent local exchange carrier (“ILEC”). These voice service totals include local and long-distance service packages. Hanson also provides Voice over Internet Protocol (“VoIP”) phone services for commercial and residential customers, which includes soft switching technology, IP commercial telephones, and unified messaging.

STIR/SHAKEN Obligation

In instances where Hanson does not originate Internet Protocol (“IP”) voice traffic, it is not subject to the requirements to implement the STIR/SHAKEN authentication framework in the non-IP portions of a network. Under the TRACED Act, the Commission granted extensions of the June 30, 2021, caller ID authentication framework deadline to certain

categories of voice service providers. Given its reliance on TDM networks for certain of its subscribers, Hanson qualifies for an extension of the June 30, 2021 deadline for those portions of its network that rely on non-IP technology to deliver service or calls under 47 C.F.R. § 64.6304(d), which allows for extensions for the “portions of a voice service provider’s network that rely on technology that cannot initiate, maintain, and terminate SIP calls” until a solution for such calls is reasonably available. Consistent with the FCC’s rules, Hanson is working to identify a non-IP solution through its relationships with current third-party providers and membership in USTelecom – the Broadband Association and NTCA.

RMD Certifications

As certified in the RMD:

- All calls that Hanson originates on its network are subject to this Robocall Mitigation Plan.
- All calls that Hanson carries or processes on its network are subject to this Robocall Mitigation Plan.
- No prior Hanson certification has been removed by FCC action and Hanson has not been prohibited from filing in the Robocall Mitigation Database (RMD).
- At any time in the prior two years, Hanson has not been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient RMD certification or mitigation program description.

Robocall Mitigation Plan

Customer Onboarding and Know Your Customer Protocols

Consistent with 47 C.F.R. §64.1200(n)(4), Hanson takes affirmative, effective measures to prevent new and renewing customers from using its network to originate illegal calls, including knowing its customers and exercising due diligence in ensuring that its services are not used to originate illegal traffic. Hanson follows appropriate Know Your Customer (“KYC”) protocols when onboarding new commercial customers, and when existing customers renew their services by transitioning from Hanson’s legacy services to new or different services.

As part of its KYC protocols, Hanson requires any commercial customer to provide sufficient information to ensure its legitimacy. Among other things, Hanson generally requires its commercial customers to provide the full legal name of the company (and its parent company if applicable), the physical address of its operations, the billing name and address (when different), and the customer contact name and telephone number, as applicable. Hanson's onboarding for its commercial customers also includes an application for service that can be used as a condition precedent to the initial establishment of service.

For its residential subscribers, Hanson conduct's identity checks for customers when they start service. Specifically, Hanson searches its internal systems to determine if any new or renewing customers have a previous outstanding balance or bad debt.

Operating as a small rural providers of voice services, the number of upstream providers is limited. In all cases there is a longstanding relationship with the upstream providers and Hanson maintains an awareness of their nature of business and the legitimacy of their call transmission services. The Robocall Mitigation Database is monitored to ensure that all upstream providers have current mitigation plans and that none have been suspended or revoked by the FCC. Upstream provider Mitigation Plans are reviewed for the details of their actions to mitigate illegal robocalls. Future contractual agreements with upstream providers will include provisions designed to mitigate illegal robocalls. Hanson will not accept direct traffic from any voice service provider or gateway provider that is not listed in the Robocall Mitigation Database

Accepting Calls from Non-Gateway Intermediate Providers---STIR/SHAKEN Obligation

Pursuant to the *Sixth Caller ID Authentication Report and Order*, Hanson will not accept any traffic directly from a non-gateway intermediate provider not listed in the Robocall Mitigation Database, effective May 28, 2024.

The reliance on TDM technology is due in large part to the inability of connecting ILECCs and IXC's that do not currently offer IP Connectivity, such as Verizon Wireless.

Contractual Provisions to Mitigate Origination of Illegal Robocalls

Both commercial and residential voice service customers of Hanson are subject to appropriate terms and conditions that (1) obligate customers not to use Hanson's services for unlawful purposes; and (2) preserve Hanson's right to terminate customers for violations of the law.

For commercial customers, Hanson maintains a Master Service Agreement ("MSA") which includes a termination clause for violations of federal, state, and local laws, rules, and regulations applicable to use of Hanson's services or their equipment. For its commercial customers, Hanson also reserves the right to discontinue service without notice, "in the event of a violation of any law, rule, or regulation of any government authority having jurisdiction over the service," or in the event of fraudulent use of Hanson's network.

The ("MSA") prohibits the signatory from tampering with equipment or software to falsify caller ID by data or voice. It also requires the signatory to safeguard its network against unauthorized access to long distance services.

Analyzing and Monitoring Network Traffic

Hanson also has procedures governing the analysis and monitoring of its outbound network traffic. Consistent with Principle #3 of the "Anti-Robocall Principles for Voice Service Providers. Hanson analyzes voice network traffic originating from its network on a twenty-four-hour basis to identify and monitor patterns consistent with illegal robocalls.

In its capacity as an originating voice service provider and a non-gateway intermediate provider, Hanson has selected the following third-party vendors for a variety of traffic analysis and robocall mitigation purposes: iconectiv, Sansay, and TransNexus. As applicable, Hanson may utilize third-party services to sign calls with the appropriate STIR/SHAKEN header, conduct additional analysis of its inbound traffic, label calls based on the reputation of the caller, and block calls from carriers that are not listed in the FCC's Robocall Mitigation Database. Hanson is working to expand on its call blocking capabilities to further prevent illegal robocalls from reaching its end-user customers.

Investigating Suspicious Calling Patterns

Traffic originating from the Hanson network is subject to a series of automated monitoring and alarm systems for each call detail record (“CDR”) generated on its network. If a CDR rule is violated (*e.g.*, excessive call volumes, etc.), we get an alarm and the call is disabled.

In the event the calls associated with the CDRs are determined to be fraudulent, we will take appropriate measures to mitigate such traffic. These measures include, but are not limited to, working with the originating customer to resolve problematic traffic, termination of the subscriber originating such traffic, as well as possible referrals to relevant enforcement agencies where appropriate.

Participation in the Industry Traceback Group

Hanson takes the issue of unwanted and illegal robocalls seriously and is committed to ensuring that its network is not utilized for the origination of such calls. Hanson will respond fully, within 24 hours, to all call traceback requests from the Commission, law enforcement, and the industry Traceback Consortium, and will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate, process, or carry calls.

Designated Employee Responsible for Robocall Mitigation-Related Issues

The name, title, department, business address, telephone number, and email address of the person within Hanson responsible for addressing robocall mitigation-related issues, to include traceback inquiries from the FCC, the Traceback Consortium, and law enforcement agencies, is as follows:

Contact Name: Jason Neumeier
Contact Title: CTO
Street: 2 Willipie St.
Contact City: Wapakoneta
Contact State: OH
Zip Code: 45895
Contact Telephone Number: 419-739-2206
Contact Email: Jason.neumeier@telserco.com

Employee Training

Hanson has implemented a training program that focuses on ensuring that personnel receive appropriate training on issues related to illegal robocalls. Each member of the NOC Department and each member of the Regulatory group will receive a copy of this Robocall Mitigation Plan for their review and records.

Exhibit A

Robo-Call Mitigation Supplement, for

- Telephone Service Company, Wapakoneta, OH
- TSC Communications Inc. Wapakoneta, OH
- Middle Point Home Telephone Company, Wapakoneta, OH
- Hanson Communications of Ohio, Wapakoneta, OH

The name, address, citizenship, and principal business of the entities that directly own at least ten (10) percent of Hanson Communications Inc. Willmar, MN.

Name and Address	Ownership	Citizenship	Principal Business
Hanson Communications, Inc. 1104 19 th Ave SW, STE B Willmar, MN 56201	100%	U.S.	Holding Company ³

The name, address, citizenship, and principal business of the entities that directly own at least ten (10) percent of the stock of Hanson Communications, Inc. (“HCI”) are:

Name	Address	Citizenship	Principal Business	Ownership
Bruce Hanson	848 S Andrew Dr. NE New London, MN 56273	U.S.	Telecommunications	20.51%
Mark Hanson	168 Southmoor Shores St Marys, OH 45885	U.S.	Telecommunications	23.18%
Susan Anderson	1335 121 st Street West Rosemount, MN 55068	U.S.	Telecommunications	20.51%

The remaining 35.80% is held by ten individual qualified subchapter S trusts with ten individual family-member beneficiaries, each in the amount of 3.58% equity. Accordingly, none of the individual trusts meet the ten percent reporting threshold. Nevertheless, Hanson confirms that each trustee and beneficiary is a U.S. citizen.

Exhibit A

Hanson Communications, Inc. ILEC Affiliate Chart

Company Name	Study Area Code	State of Operation	Access Line Count	FRN
Buckland Telephone Company	300591	OH	378	0004338851
Clara City Telephone Company	361370	MN	538	0004329611
Sacred Heart Telephone Company	361476	MN	214	0004329629
Fort Randall Telephone Company d/b/a Mt. Rushmore Telephone Company	391660	SD	3,128	0004329587
Hanson ⁱ Communications of Ohio, LLC	300604 300618 300649	OH	3,864	0031551260
Starbuck Telephone Company	361487	MN	661	0004329652
Telephone Service Company ⁱⁱ	300659	OH	4,587	0002924751
The Middle Point Home Telephone Company	300633	OH	392	0005066063
Zumbrota Telephone Company	361515	MN	883	0004328134

ⁱ FKA, Germantown Telephone Company, Columbus Grove Telephone Company, Orwell Telephone Company

ⁱⁱ TSC Communications Inc. a wholly owned subsidiary of Telephone Service Company operates as a CLEC in OH.