

Robocall Mitigation Plan

Chaparral Holding Corporation / Chaparral CableVision

Chaparral Holding Corporation / Chaparral CableVision is an interconnected Voice over Internet Protocol (VoIP) service provider dedicated to preventing illegal robocalls from originating on our network while monitoring the calls coming into our network. In compliance with FCC regulations, we certify in the Robocall Mitigation Database that we:

1. Fully implement STIR/SHAKEN across our network, or
2. Implement STIR/SHAKEN on a portion of our network while subjecting the remaining calls to a Robocall Mitigation Plan (RMP), or
3. Have not fully implemented STIR/SHAKEN but subject all calls to an RMP to ensure no illegal robocalls originate from our network.

The FCC requires VoIP providers to develop an RMP that:

- Lists specific, reasonable steps taken to avoid originating illegal robocall traffic,
- States a commitment to fully and timely respond to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and
- Cooperates with entities investigating and stopping illegal robocallers using its services to originate calls.

STIR/SHAKEN Extension

Chaparral CableVision qualifies for and has utilized the STIR/SHAKEN implementation extension under 47 CFR § 64.6304, as we have fewer than 100,000 voice subscriber lines. All voice traffic originating on our network is subject to the robocall mitigation program outlined below.

Know Your Customer

We follow best practices for vetting caller identity as described by the NANC Call Authentication Trust Anchor Working Group. Source.

International Subscribers

Chaparral CableVision does not sell origination or termination services to subscribers outside the United States.

Acceptable Use Policy

Chaparral CableVision maintains an Acceptable Use Policy (AUP) that subscribers must agree to before using our broadband or voice services. The AUP prohibits fraudulent activities and violations of local, state, or federal law.

Traceback Requests

Chaparral CableVision is committed to promptly and fully responding to all traceback requests from the FCC, law enforcement, state attorneys general, and the industry traceback consortium. We cooperate with these entities to investigate and stop illegal robocallers using our services to

originate calls. Subscribers must comply with traceback requests as outlined in our AUP. Requests can be sent to **Noc@o365.chaparralwireless.com** for immediate processing.

Telephone Number Validation

If a subscriber uses a telephone number (TN) not directly managed by Chaparral CableVision as a caller identity, we require validation via a valid Letter of Authorization. Once sufficient documentation is provided, it will be shared with our VoIP providers to attest to calls originating with these TNs.

Investigation of High-Volume Network Traffic, Suspicious Calls, and Calling Patterns

Our wholesale VoIP provider monitors origination voice traffic in real time to prevent illegal robocalls. They provide detailed reporting to identify suspicious calls, including calls from invalid numbers, unallocated numbers, numbers on Do Not Originate lists, and numbers with poor reputations.

Chaparral CableVision immediately investigates flagged calls. If found to be originating unlawful robocalls, we take appropriate action, including warnings or service termination, as outlined in our AUP.

Examples of monitored patterns include:

- Higher-than-expected costs generated by calls from a subscriber,
- Repeated calls to specific numbers or geographic locations,
- Calls to high-cost locations with short durations,
- Anomalies in call duration or answer-seizure ratio, and
- Traffic trends inconsistent with historical patterns.

STIR/SHAKEN Implementation

As a provider with fewer than 100,000 subscribers, Chaparral CableVision was granted an extension to implement STIR/SHAKEN caller ID authentication. We have completed this implementation and currently use necessary authorizations and certificates to remain compliant. Chaparral CableVision remains committed to effectively mitigating and preventing illegal robocall traffic originating on its voice network.

This plan outlines our ongoing commitment to complying with FCC regulations and safeguarding our network from illegal robocall activity.