

Implementation of Robocall Mitigation Strategy (RMD)

1- Caller ID Verification: We ensure our caller ID information is accurate and unique by utilizing tools like Mix/SHAKEN, which authenticate calls originating from our organization.

2- Employee Training: Our staff undergo comprehensive training on FCC regulations concerning robocalls. We emphasize the importance of compliance, instructing employees to initiate calls only with explicit consent or in the case of an existing business relationship.

3- Call Blocking and Filtering: To prevent illegal robocalls from reaching our customers, we deploy robust call-blocking and filtering mechanisms. These mechanisms are regularly updated and include a maintained list of known robocall numbers for blocking.

4- Call Traffic Monitoring: We utilize advanced call analysis tools and algorithms to detect and isolate unusual call traffic patterns that may indicate robocall activity. Upon detection of suspicious patterns, alerts are issued, and investigations are promptly initiated.

5- Consent Acquisition: Remaining updated on FCC regulations, we ensure that we obtain explicit consent from individuals before initiating any communications. Detailed records of consent, including the date, time, and method of acquisition, are diligently maintained.

6- Mitigation Service Offering: We provide our customers with the option to opt-in to robocall mitigation services. The benefits of such services, particularly in reducing nuisance calls, are clearly communicated to our customers.

7- Violation Reporting: Both employees and customers are encouraged to report any robocall violations to the FCC. We collaborate closely with law enforcement and regulatory agencies in investigations related to robocall fraud.

8- Compliance Record Keeping: Organized records of all calls made by our organization, including call logs, timestamps, and call content where applicable, are meticulously maintained. Compliance with regulations such as the Telephone Consumer Protection Act (TCPA) is ensured.

9- Regular Review and Update: We conduct periodic reviews of our robocall mitigation plan to assess its effectiveness. Necessary updates and adjustments are made to ensure ongoing compliance with evolving FCC regulations.

10- Promotion of Compliance Efforts: Demonstrating our commitment to robocall mitigation and FCC compliance is crucial in building trust with customers and partners. Relevant information is provided on our website and in customer communications.

11- Legal Guidance: We consult with legal experts specializing in telecommunications and regulatory compliance to ensure ongoing compliance with all relevant laws and regulations.

12- Compliance with Regulatory Requirements: It's imperative to incorporate timely response protocols in our RMD plan as per regulatory mandates. Emphasizing traceback responses within 24 hours demonstrates our commitment to maintaining regulatory compliance, thus mitigating potential risks associated with non-compliance.

13- Enhanced Operational Efficiency and Effectiveness: Implementing a provision for traceback response within 24 hours not only aligns with regulatory expectations but also enhances the efficiency and effectiveness of our RMD plan. Swift response times enable us to promptly address issues and safeguard network integrity, reinforcing trust and reliability among stakeholders.

By implementing this Robocall Mitigation Strategy, Germantown Telephone aims to comply with FCC regulations, reduce the risk of Robocall violations, and contribute to a more trustworthy

telecommunications environment for both our business and our customers. Recognizing that compliance with FCC regulations requires ongoing diligence and adaptability.