

Yadkin Valley Telephone Membership Corporation (YVTMC)

Robocall Mitigation Plan (RMP)

Company Information

Legal Name: Yadkin Valley Telephone Membership Corporation (YVTMC)

Operating Company Numbers (OCNs):

5418 – Competitive Local Exchange Carrier (CLEC)

YVTMC is a facilities-based voice service provider serving residential and business customers. YVTMC currently supports approximately 13,000 voice subscriber lines and qualifies as a small voice service provider.

Purpose of Robocall Mitigation Plan

This Robocall Mitigation Plan (RMP) is implemented to prevent the origination, carriage, and termination of unlawful robocalls on YVTMC's network in accordance with:

- 47 CFR §§ 64.6300–64.6308
- FCC STIR/SHAKEN Orders and subsequent rule modifications
- FCC Robocall Mitigation Database (RMD) requirements

This plan applies to all calls originating on, transiting, or terminating on YVTMC's network and will be updated as necessary to remain compliant with evolving FCC rules and industry best practices.

STIR/SHAKEN Implementation Status

YVTMC has implemented partial STIR/SHAKEN authentication on the IP portions of its network.

- STIR/SHAKEN call authentication is deployed using Ribbon Communications equipment.
- YVTMC authenticates calls on IP-enabled network segments using industry-standard STIR/SHAKEN protocols.

- YVTMC is eligible for the STIR/SHAKEN implementation extension and relies on a valid non-IP network extension pursuant to 47 CFR § 64.6304(d) for legacy TDM and other non-IP network elements where STIR/SHAKEN authentication is not technically feasible.

47 CFR § 64.6304(d) **Non-IP Networks** - Those portions of a voice service provider, gateway provider, or non-gateway intermediate provider's network that rely on technology that cannot initiate, maintain, carry, process, and terminate SIP calls are deemed subject to a continuing extension. A voice service provider subject to the foregoing extension shall comply with the requirements of § 64.6303 (a) as to the portion of its network subject to the extension, a gateway provider subject to the foregoing extension shall comply with the requirements of § 64.6303 (b) as to the portion of its network subject to the extension, and a non-gateway intermediate provider receiving calls directly from an originating provider subject to the foregoing extension shall comply with the requirements of § 64.6303 (c) as to the portion of its network subject to the extension.

To meet the non-IP network criteria for the continuing STIR SHAKEN extension (§ 64.6303 (a)(2)), YVTMC is a member of NTCA. NTCA participates in the ATIS PTSC Non-IP Call Authentication Task Force working group which developed the (ATIS Solutions) non-IP call authentication solutions. NTCA is serving as YVTMC's third-party representative on the ATIS PTSC Non-IP Call Authentication Task Force working group.

YVTMC does not certify to complete STIR/SHAKEN implementation across its entire network due to the presence of non-IP infrastructure. The company certifies appropriately as a partial STIR/SHAKEN implementer in the FCC Robocall Mitigation Database.

For IP portions of its network subject to STIR/SHAKEN requirements, YVTMC is registered with the STIR/SHAKEN Policy Administrator and Ribbon is YVTMC's certified STI-CA provider, and their solution includes the ability to obtain, apply and utilize those certificates.

Role in the Call Chain

YVTMC operates in the following roles within the call path:

- Originating Voice Service Provider
- Terminating Voice Service Provider

YVTMC does not operate as a gateway provider and does not directly receive calls from foreign providers at US-based facilities.

Robocall Detection, Monitoring, and Analytics

YVTMC employs active monitoring and analytics to detect and mitigate illegal robocalls.

Monitoring Practices

- Continuous monitoring of voice traffic to identify abnormal calling patterns
- Detection of unusual call volume spikes and suspicious traffic behaviors
- Monitoring for invalid, unallocated, or unauthorized calling party numbers

Third-Party Analytics Vendor

YVTMC utilizes Neustar Robocall Mitigation Services to support its robocall detection and mitigation efforts.

Neustar's solution includes: - Behavioral analytics based on large-scale carrier call data - Identification of neighbor spoofing events - Detection of sudden call volume spikes - Enforcement of Do-Not-Originate (DNO) lists - Real-time alerts and reporting

Calls identified as suspected illegal robocalls may be blocked, flagged via CNAM indicators, or subject to further investigation.

Response to Suspected Illegal Robocalls

When suspected illegal robocall activity is identified, YVTMC may take one or more of the following actions:

- Validate the subscriber or upstream provider's authorization to use the calling telephone number
- Contact the originating customer or carrier for investigation
- Suspend or terminate the ability to originate calls on the network
- Cooperate with traceback investigations and law enforcement

Traceback Cooperation

YVTMC commits to cooperating fully with traceback requests from:

- The Federal Communications Commission (FCC)
- Federal, state, and local law enforcement agencies
- The Industry Traceback Group (ITG)

YVTMC will respond fully and in good faith within twenty-four (24) hours.

Know-Your-Customer (KYC) Procedures

YVTMC maintains procedures to prevent customers from originating illegal robocalls.

These procedures include: Identity verification for all new residential and business customers - Verification prior to activating service or making significant account changes - Ongoing review of customer calling behavior

Appropriate enforcement action is taken if illegal robocalling activity is suspected.

Know-Your-Upstream Provider Procedures

YVTMC maintains awareness of all upstream providers from which it receives voice traffic.

YVTMC takes reasonable steps to: - Confirm upstream providers are listed in the FCC Robocall Mitigation Database - Review upstream providers' robocall mitigation practices and incorporate robocall mitigation and traceback cooperation language into interconnection agreements.

Enforcement and Ongoing Compliance

YVTMC enforces its robocall mitigation policies through:

- Monitoring and investigation of suspicious traffic
- Customer and carrier enforcement actions as warranted
- Regular review and updates to this Robocall Mitigation Plan

YVTMC will update its Robocall Mitigation Database filing within 10 business days of any material change to this plan or company information, as required by FCC rules.

Certification

YVTMC certifies that the information contained in this Robocall Mitigation Plan is accurate and truthful and is provided in good faith to comply with FCC robocall mitigation requirements.

Principals & Parent Company

The Principals of Yadkin Valley Telephone Membership Corporation (YVTMC) are: Ken Mills serves as the CEO of YVTMC. Brad Worthen serves as the COO of YVTMC. Sharon Reid serves as Vice-President of Operations. Darrell Walker serves as Vice-President of Technology. Jacob Botta serves as Vice-President of Marketing. Scott Hall serves as Vice - President of Sales & Human Resources. The YVTMC Board of Directors (Mike Howard, Mike Morton, Tommy Jester, Todd Freeman, Scott Brendle, Lisa Wishon, Dan Hutchens, and Jimmy White) have Managing Control of YVTMC and all its affiliates and subsidiaries. The Data Center is a subsidiary of Yadkin Valley Telecom, and Yadkin Valley Telecom d/b/a Zirrus is a subsidiary of YVTMC. Yadkin Valley Telephone Membership Corporation (YVTMC) is the parent company of The Data Center and Yadkin Valley Telecom d/b/a Zirrus.