

ARTELCOM, LLC
Robocall Mitigation Plan
Version 1
February 19, 2026

1. Purpose of Robocall Mitigation Plan.

ARTELCOM, LLC ("ARTELCOM") is dedicated to stopping illegal robocalls from originating on its network and to cooperating with the Federal Communications Commission ("FCC"), law enforcement, and the Industry Traceback Group.

This document describes its Robocall Mitigation Plan and "reasonable steps" that are being taken to prevent the origination of illegal robocalls as required by the TRACED Act and FCC rules.

2. Company Information.

ARTELCOM, a fully owned subsidiary of The Arthur Mutual Telephone Company ("Arthur Mutual," FRN 0004329330), is a small, rural broadband internet service provider that also offers resale VoIP service provided by a third-party. ARTELCOM serves fewer than 1,000 resale VoIP lines, meeting the definition of "small voice service provider" defined in 47 CFR §64.6304(a)(2). ARTELCOM does not have an Operating Company Number ("OCN"), nor does it hold any number resources from the North American Numbering Plan. ARTELCOM was previously included in the Robocall Mitigation Plans filed by Arthur Mutual, its parent company and is now being filed as a separate entity.

3. Role in the Call Chain

ARTELCOM is a "voice service provider" with no STIR/SHAKEN obligation since it does not own nor control the necessary infrastructure necessary to implement STIR/SHAKEN. ARTELCOM resells VoIP service provided by QualStar Communications, Inc. ("QualStar," OCN 2094, FRN 0006761415) which has a current filing in the Robocall Mitigation Database. QualStar, an affiliate of Arthur Mutual, is a facilities-based Competitive Local Exchange Carrier that provides the network infrastructure, number resources to originate VoIP calls into the public network, and STIR/SHAKEN functionality. ARTELCOM merely resells QualStar's VoIP services and does not possess any of the necessary network infrastructure. See section 4 of this plan for details of the exemption being claimed.

4. Exemption Claimed from Implementation of STIR/SHAKEN.

ARTELCOM claims exemption from STIR/SHAKEN obligations pursuant to the *First Caller ID Authentication Report and Order*, 35 FCC Rcd at 3260, para. 40, which states, "Finally, we clarify that the rules we adopt today do not apply to providers that lack the network infrastructure necessary to implement STIR/SHAKEN." This exemption is further explained in the *Eighth Caller ID Authentication Report and Order*, 39 FCC Rcd at 12894, para 17 and accompanying footnotes, state, "Thus, if a wholesale provider originates a call

onto the public network on behalf of a reseller customer that lacks control over the network infrastructure necessary to implement STIR/SHAKEN, it is the wholesale provider that has the STIR/SHAKEN implementation obligation, not the reseller.”

5. Certification of Call Origination Procedures

ARTELCOM certifies that all resale VoIP originating calls on its network are subject to this Robocall Mitigation Plan (“RMP”).

6. Participation in Traceback.

ARTELCOM certifies that it will respond fully, within 24 hours, to all traceback requests from the Federal Communications Commission ("FCC"), law enforcement and the Industry Traceback Group ("ITG") and will fully cooperate with such entities in investigating and stopping illegal robocallers that use its service to originate, carry, or process illegal robocalls. A single point of contact has been established to respond to any requests.

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ARTELCOM follows the *ITG Policies and Procedures* document, including the *Provider Traceback Best Practices* contained in Appendix A. (This document is available at: <https://tracebacks.org/itg-policies-and-procedures/>).

7. Eligibility to Participate in the Robocall Mitigation Database.

ARTELCOM certifies that it and its parent company have not been barred or prohibited from filing in the Robocall Mitigation Database pursuant to a law enforcement action. It further certifies that the company has not at any time in the prior two years, 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, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

8. Measures to Prevent New and Renewing Customers from Originating Illegal Robocalls: Subscriber Vetting (Know Your Customer, Customer Identification and Due Diligence).

ARTELCOM utilizes the three key components of Know Your Customer (“KYC”) plans required in the financial services industry: Customer Identification, Customer Due Diligence, and Ongoing Monitoring. One benefit of being a small company is that ARTELCOM employees know all their business customers, their lines of business and normal calling patterns. The employees know most residence customers by name. In addition, the company utilizes *Best Practices for the Implementation of Call Authentication Frameworks* published by the NANC Call Authentication Trust Anchor Working Group. (This document is available at:

<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf> and FCC Public Notice DA 20-1526, released December 22, 2020).

Vetting of subscribers, particularly business subscribers that purchase service capable of supporting high call volumes, involves obtaining information such as:

- Legal business name and trade names
- Federal tax ID
- State of Incorporation (only for foreign corporations)
- Nature of the business
- Primary contact person
- Service addresses
- Any authorized telephone numbers that are not provided by Arthur

If the business were a wholesale customer of ARTELCOM, additional information would be required such as:

- OCN(s) and proposed use of wholesale services
- FCC Form 499-A Filer ID Number
- FCC Form 499-A filing status
- Robocall Mitigation Plan content and filing status

Vetting residential and small business customers involves obtaining information such as service address, billing address, primary location, and responsible party as part of normal business practices.

New and renewing customers will be subject to service agreements and acceptable use policies that are designed to mitigate illegal robocalls. Failure to comply with the agreements and policies regarding illegal robocalls may result in service being discontinued.

9. Telephone Number Validation (KYC – Monitoring).

ARTELCOM maintains a list all telephone numbers that are assigned by QualStar to ARTELCOM's resale VoIP customers, including ported-in numbers. The list of active numbers that are assigned to specific customers insures the ability to complete any traceback activity to a specific end user. Telephone number validation for the resale VoIP operation is provided by the underlying voice service carrier, Qualstar.

10. Third-Party Validation and Real-Time Network Monitoring (KYC – Monitoring).

These functions are performed by QualStar, the underlying VoIP service provider, and utilize the ClearIP monitoring system from TransNexus that captures call details and provides call analytics, responses, and reports in real-time to process calls on its IP Network.

11. Know Your Upstream Providers.

ARTELCOM utilizes a single VoIP carrier for its resale services. Since this VoIP carrier is an affiliate of ARTELCOM's parent company, there is ample knowledge regarding the upstream provider and its implementation of STIR/SHAKEN. The Robocall Mitigation Database is monitored to ensure that its upstream provider has a current mitigation plan, and it has not 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..

12. Accepting Calls from Non-Gateway Intermediate Providers or Providers that are No Longer listed in the RMD.

ARTELCOM has advised QualStar that it will not accept any traffic directly from a non-gateway intermediate provider nor any provider not listed in the Robocall Mitigation Database. Since ARTELCOM does not have the network infrastructure to screen inbound calls, it must rely on QualStar for this function.

13. International Services.

ARTELCOM does not sell any services to international call originators using NANP number resources.

14. Mitigation Plan Revisions.

ARTELCOM is committed to updating this plan as conditions change. The Robocall Mitigation Database will be updated within ten (10) business days of any substantial changes to the current plan.

15. Principals, Affiliates, Subsidiaries, and Parent Companies.

Officers and Directors of ARTELCOM, LLC

Eric Roughton, Secretary/Treasurer and General Manager
Sue Becher
Mark Detter
Bret Keller
Kevin Mast
Dan Schaffer
Scott Stambaugh
Richard Thomas

Shareholders with 10% or greater ownership

None

Affiliates

None

Subsidiaries

None

Parent Company

The Arthur Mutual Telephone Company (FRN 0004329330)

Trade Names

None

Previous Business Names

None