

Robocall Mitigation Plan Description for Home Telephone Company

1. Home Telephone Company Is a Small Service Provider, serving fewer than 100,000 voice service subscriber lines. For purposes of this paragraph (a), “small voice service provider” means a provider that has 100,000 or fewer voice service subscriber lines (counting the total of all business and residential fixed subscriber lines and mobile phones and aggregated over all of the provider's affiliates).
2. Home Telephone Company commits to respond to all trace back requests from the Commission, law enforcement, and industry trace back consortium within 24 hours, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.
3. Home Telephone Company has taken the following specific steps to detect originating robocall traffic:
 - a. Deploy Call Guardian through our Metaswitch
 - i. Call Guardian along with TNS Call Guardian Authentication Hub will analyze every originating and terminating call for real-time robocall detection
 - b. Call Guardian Authentication Hub
 - i. Detects problems as they occur and provides support for Do Not Originate, invalid, unallocated, unassigned, and spoofed numbers.
4. Home Telephone Company has taken the following steps to prevent illegal originating robocalling traffic:
 - a. Home Telephone Company confirms the identity of all of their customers by collecting the physical location and mailing address of the account, the entity's Federal Tax Identification Number and the entity's contact person and information. Home Telephone Company also utilizes the national database Online Utility Exchange to confirm and validate the details of the entity.
5. Home Telephone Company has taken the following steps to mitigate illegal originating robocalling traffic upon detection:
 - a. Any customers who have been reported or identified will be notified immediately. Any customer participating in illegal robocalling activity will be suspended from originating any calls. If the customer fails to respond, the originating and terminating services will be suspended.

Home Telephone Company, Inc. is a subsidiary of Home Enterprises, Inc. and a sister company to Home Communications, Inc. Home Telephone Company, Inc. listing principals are as follows:

Becki Regier – CEO

Richard Baldwin – Home Telephone Company, Inc. Board President

Brian Williams – Service Operations Manager

Brett Williams – Network Operations Manager