

Granby Telephone Company, Inc.
GTC Broadband, Inc.
ROBOCALL MITIGATION PLAN

1. Granby Telephone Company has implemented the STIR/SHAKEN framework on the IP-enabled sections of its network, as required by 47 C.F.R. § 64.6301. To do so, Granby uses a third-party call authentication service offered by Ribbon that handles all IP-enabled calls originating on Granby's network.

As a provider with fewer than 100,000 voice service subscriber lines, Granby fell under an extension to implement the STIR/SHAKEN framework until June 30, 2023. The present STIR/SHAKEN solution was fully implemented as of June 30, 2023. Granby thus certifies compliance with the requirement to adopt the STIR/SHAKEN framework on IP networks by that date.

For all non-IP originating traffic, Granby continues to follow the robocall mitigation measures described below:

2. Granby Telephone Company commits to respond within 24 hours to all trace back requests from the Commission, law enforcement, and industry trace back consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

3. Granby Telephone Company is a very small local service provider with a small group of business customers having multiple lines. Business subscribers service applications require a business physical address, a direct point of contact, and the general nature of their business. The only subscriber, with a large group of business lines, is a local school district.

If, in the event, an anomaly of originating traffic was detected on the network, it would be easily identifiable and addressed with the subscriber promptly.

Robocall Detection and Mitigation Process

GTC uses a billing vendor called MACC that tracks our subscribers' activities. In the event of an unusual traffic origination is detected, we will ask the customer for an explanation. If it is determined that they are originating illegal robocall traffic, we will terminate their service after multiple violations.

TDM Robocall Detection and Mitigation Process

GTC processes call detail records and reviews them monthly to confirm call volumes are comparable to previous reporting periods and investigates any large spikes in traffic. If GTC

determines that the caller was attempting to originate unlawful robocalls, GTC will warn to stop them up to and including termination of service as appropriate.