Robocall Mitigation Plan for
Consolidated Communications Networks, Inc.
Pre-June 30, 2021 Certification Deadline

This mitigation plan describes the process and procedures that Consolidated Communications Networks, Inc., Consolidated hereafter, uses to alleviate the origination of illegal robocalls on its network.

1. Customer Interaction:
   Consolidated takes the following steps with respect to its customers to prevent originating robocalls.
   a. Consolidated verifies new residential customers are legitimate by using Social Security Number and a soft credit check or by requiring a Letter of Reference from another utility company;
   b. Consolidated verifies new business customers are legitimate by using Tax Identification Number and a soft credit check;
   c. Consolidated has adopted a Voice Services Acceptable Use Policy (VSAUP) that describes action taken for illegal robocalls. This VSAUP is available on Consolidated's website at Voice Services Acceptable Use Policy.pdf (ctctel.com) ;
   d. Consolidated provides customer education to its customer base on robocalls. The robocall customer education information is on Consolidated's website at Robocall Information - Consolidated (ctctel.com) ;
   e. Consolidated's Robocall Mitigation Plan is on Consolidated's website at Robocall Information - Consolidated (ctctel.com);
   f. Consolidated encourages its customers to enroll in the Do Not Call Registry when they sign up for service, by bill stuffers and on its website at Do Not Call Registry Info - Consolidated (ctctel.com) .

2. Originating Traffic Monitoring:
   Consolidated will be using the Metaswitch Call Guardian Authentication Hub for robocall mitigation. This is a fully managed service to provide real-time reputation scoring and analytics to fight both originating and terminating robocalls. Consolidated will review the Call Guardian analytics daily and take appropriate action based on the reputation scoring and analytics, and in accordance with its Voice Services Acceptable Use Policy. Consolidated has ordered the Call Guardian Authentication Hub from Metaswitch and will install and implement its use as soon as it is received from the vendor. Currently Consolidated is blocking the origination of all unallocated and unused Consolidated telephone numbers.

3. Robocall Mitigation Enforcement:
   Consolidated will block originating traffic identified as illegal robocalls and may terminate service entirely, in accordance with its Voice Services Acceptable Use Policy which prohibits use of telephone numbers for illegal robocalls and fraudulent purposes . Telephone numbers flagged as being used for illegal robocalls will be reported to the FCC and FTC. Consolidated is currently blocking the origination of all unallocated and unused Consolidated telephone numbers and will be blocking telephone numbers identified as invalid per the Call Guardian Authentication Hub daily report once Call Guardian Authentication Hub is installed.

4. Traceback requests:
   Consolidated will fully comply and assist with all traceback requests from the FCC, law enforcement and the industry traceback consortium (US Telecom).

5. Point of Contact: Jeremy Witte, Network Manager, is Consolidated's single point of contact for robocall mitigation efforts.
   Office: 701-483-7358
   Cell: 701-260-2348

6. Implementation Deadline:

Consolidated is small voice service provider with less than 100,000 subscribers and is exempt from the requirements of full STIR/SHAKEN protocols through June 30, 2023.

Effective May 3, 2021