

Robocall Mitigation Plan for Consolidated Telcom

This mitigation plan describes the process and procedures that Consolidated Telcom, 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 is using the Metaswitch/TNS 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 reviews the Call Guardian analytics daily reports and takes appropriate action based on the reputation scoring and analytics, and in accordance with its Voice Services Acceptable Use Policy. Consolidated is also blocking calls originating from invalid numbers per the FCC's 2017 Call Blocking Order.

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 the 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 blocking calls originating from invalid numbers per the FCC's 2017 Call Blocking Order. Consolidated is using the Metaswitch/TNS Call Guardian analytics technologies and services to monitor traffic on its network and identify potentially unlawful call origination activity.

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 for Robocall Mitigation Efforts:

Jeremy Witte, Network Manager
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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.

Submitted by:

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