

## **Ringgold Telephone Company Robocall Mitigation Plan**

Ringgold Telephone Company (Ringgold), Operating Company Number (0382), is eligible for the continuing extension of the STIR SHAKEN implementation deadline as a small voice service provider (§64.6304 (a)(2) that has non-IP portions within its network §64.6304(d).

Ringgold provides local service to fewer than 100,000 voice subscriber lines. The majority of customers are served on the non-IP portions of Ringgold's network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

Ringgold is eligible for the continuing extension of the STIR SHAKEN implementation deadline as a small voice service provider (§64.6304 (a)(2) that has non-IP portions within its network §64.6304(d). To meet the non-IP network criteria for the continuing STIR SHAKEN extension (§ 64.6303 (a)(2)), Ringgold is a member of NTCA. NTCA participates on the ATIS PTSC Non-IP Call Authentication Task Force working group which developed the (ATIS Solutions) non-IP call authentication solutions. NTCA is serving as Ringgold's third-party representative on the ATIS PTSC Non-IP Call Authentication Task Force working group.

Ringgold also originates calls via SIP within its network. Ringgold is registered with the STI-PA as an authorized user. Ringgold SIP-originated calls are signed with the Ringgold certificate.

### **ROBOCALL MITIGATION PLAN**

Ringgold has implemented the following Robocall Mitigation Plan to detect and prevent unlawful robocalls from originating on its network.

All calls that originate on Ringgold's network are subject to the described robocall mitigation plan.

Ringgold blocks calls originating from numbers that are not valid North American Numbering Plan (NANP) numbers, known numbers not allocated to a provider and numbers not assigned to a Ringgold subscriber or otherwise set aside for outbound call use.

Ringgold has contracted with a vendor, TransNexus, to provide robocall analytics and reputation scoring of our network's outbound traffic. The vendor's analytics identify patterns of suspected illegal robocalls and scores the calls based on their behavior and/or their status as suspected robocalls as reported to the Federal Communications Commission (FCC), Federal Trade Commission (FTC), and as reported by other carriers. Ringgold has access to the vendor's portal and receives real-time event-based notifications about telephone numbers originating suspected illegal robocalls on its network, including from unassigned, inactive and do-not-originate TNs. Ringgold also receives reports via e-mail alerts if any of its numbers experience a change in reputation such as suspicious traffic patterns or other detected anomalies outside the normal behaviour of our company's traffic. Ringgold will examine the reports and investigate and identify the source of the calls as unlawful or legitimate.

### **Customer Vetting (Know Your Customer)**

Ringgold has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Ringgold thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services.

### **Enforcement**

If it is determined a Ringgold customer is originating prohibited unlawful robocalls on our network, Ringgold. will either warn the customer to stop or terminate their service as allowed per Ringgold's policies that define the circumstances by which Ringgold will suspend or terminate service to a customer. The policies can be viewed here: <https://www.rtctel.com/disclosures>

### **Upstream Provider Knowledge**

Ringgold knows all the carriers from which it receives traffic and has confirmed that all its connected carriers are listed in the Robocall Mitigation Database.

Ringgold monitors incoming traffic from all connected carriers for suspicious call patterns indicative of illegal robocall activity. The connected carriers are made aware of any suspicious or illegal traffic identified and notified that, if the traffic does not cease, the calls may be blocked from entering RTC's network. No provider is using RTC's network to carry or process a high volume of illegal traffic.

In addition, Ringgold is now incorporating traceback and prohibited traffic language in all contractual agreements with upstream carriers.

### **Traceback**

Ringgold commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to originate calls. Ringgold will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium fully and in a timely manner within twenty-four (24) hours.

### **Customer Education**

Ringgold posts information on its website to educate customers on how to protect themselves from becoming a victim of unlawful robocallers and a process to report complaints related to robocall activity.

### **Parent, Principals, Affiliates and Subsidiaries of Ringgold Telephone Company filing entity**

Alice Evitt Bandy is the President of Ringgold Telephone Company, while Celeste Bandy Weaver serves as Executive Vice President, and Josh Roach serves as Chief Operating Officer. Ringgold Telephone Company is 100% owned by Alice Evitt Bandy. See below for the Parent, Affiliates, and/or subsidiaries of Ringgold Telephone Company.

<b>Company Name</b>	<b>Relationship to Filing Entity</b>
RTC Solutions, Inc.	Subsidiary
Ringgold Telephone Long Distance, Inc.	Subsidiary