

**Farmers Mutual Telephone Cooperative of Shellsburg d/b/a USA Communications  
And Affiliate Shellsburg Cablevision, Inc.**

**Acceptable Use Policy for Voice Robocall Mitigation**

**Curt Eldred General Manager, 319-436-2224**

**Traceback Cooperation**

USA Communications will cooperate in traceback investigations. To allow for timely and comprehensive law enforcement efforts against illegal robocallers, USA Communications will dedicate sufficient resources to provide prompt and complete responses to traceback requests from law enforcement and from USTelecom's Industry Traceback Group. USA Communications has identified a single point of contact in charge of responding to these traceback requests and will respond to traceback requests as soon as possible or in 24 hours not to include weekends or holidays.

- USA Communications will request traceback cooperation. For all new and renegotiated service applications the transport of voice calls, our web policy will specify the use of best efforts to require cooperation in traceback investigations by identifying the upstream provider from which the suspected illegal robocall entered its network or by identifying our own customer if the call originated in our network.

**Subscriber Vetting Practices**

- Residential and small business practices
  - USA Communications will vet residential and small businesses through normal business practices and will obtain billing address, primary residence, or business location.
- Commercial retail end-users
  - USA Communications will confirm the identity of commercial customers by collecting information such as physical business location, contact person(s), state or country of incorporation, federal tax ID, and the nature of the customer's business.
  - USA Communications has call detail records to determine typical call volume and potential reasons for significant deviations from the typical call volume. USA Communications will determine if there are legitimate reasons for any customer to be making a number of high volume, short duration calls. USA Communications will contact any commercial business within 24 hours of such deviations to determine if call volumes are legitimate.

**Telephone Number Validation Practices**

- Telephone Number Validation is necessary and appropriate when an End-User's right-to-use the telephone number is unknown to the VSP. USA Communications will validate as necessary and appropriate.