

HAYNEVILLE FIBER TRANSPORT, INC. D/B/A CAMELLIA COMMUNICATIONS ROBOCALL MITIGATION PLAN

Hayneville Fiber Transport, Inc. d/b/a Camellia Communications (Camellia) is a small/rural carrier eligible for the STIR SHAKEN extension granted to small voice service providers with fewer than 100,000 voice subscriber lines under 47 CFR § 64.6304.

Camellia has implemented the following Robocall Mitigation Plan to detect and prevent unlawful robocalls from originating on its network as of June 2021.

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

Hayneville Fiber Transport, Inc. ("Camellia") 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 Camellia subscriber or otherwise set aside for outbound call use. Camellia does not permit subscribers or SIP trunk users to place outbound calls from "unscreened" numbers. Camellia does not allow a customer to place an outbound call using a telephone number unless they have ported the telephone number to Camellia, or else they have ordered a new telephone number provided exclusively by Camellia.

Using vendor services, Camellia monitors long-distance originating network traffic for suspicious or abnormal call volume or activity. Long Distance Calls that meet the below qualifying factors are investigated internally to determine if the calls are legitimate or unlawful:

- High-volume voice network traffic
- Large bursts of calls in a short timeframe
- High-volume calls to premium destinations

When suspicious activity is detected, the Network Operations Center & Engineering Team is notified, who investigates suspicious outbound calling activity.

Traceback

Camellia puts a high priority on cooperation with traceback requests initiated by the FCC-authorized Industry Traceback Group. Camellia is committed to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocalls that we learn are using our service to originate calls.

Customers are required to assist in traceback investigations. Camellia has a single point of contact designated to handle traceback requests and coordinate with outside investigations.

Know Your Customer Policies

Camellia services small and medium businesses and residential customers, as well as municipalities. Camellia does not offer VoIP wholesale. Camellia does not allow foreign entities (i.e., those based permanently outside the United States) to connect directly to the network to place outbound calls. However, US-based clients may travel to use services outside the United States in compliance with laws and regulations. To prevent spoofing, Camellia collects and verifies information for each commercial customer, including details such as the physical business location, contact persons, state or country of incorporation, and federal tax ID. Camellia verifies government-issued identification for every customer.

Call Routing Policies and Reasonable Analytics

Legitimate robocalls who are placing calls in compliance with all regulations, including those placing outbound emergency notifications, appointment reminders, school, and church closing announcements, have notified Camellia of their intended use. Camellia has systems that prevent calls from being placed from numbers that are not active in the North American Numbering Plan.

Customer Inbound Nuisance Calling Prevention

Camellia offers features to subscribers that allow certain inbound nuisance calls to be blocked to reduce the amount of inbound calling, including calling captcha and anonymous call rejection. Camellia's subscribers can block calls from specific inbound calls using Selective Call Rejection.

Enforcement

If it is determined a Camellia customer is originating prohibited unlawful robocalls on our network, Camellia will either warn the customer to stop or terminate their service as allowed per Camellia's policies that define the circumstances by which Camellia will suspend or terminate service to a customer.

Customer Education

Camellia posts information on its website www.camelliacom.com to educate customers on how to protect themselves from becoming a victim of unlawful robocalls and a process to report complaints related to robocall activity.