

Robocall Mitigation Plan

Valley Telephone Cooperative Inc. (VTCI), Operating Company Number (OCN) 2159, provides a hybrid network of IP and Non-IP voice services making us only in partial compliance and exempt from implementation requirement -47 CRF § 64.630(d). To conform to (§64.6303 (a) (2) VTCI will cooperate with NTCA (<https://www.ntca.org>) in investigating a non-IP authentication solution until such time as IP based connections become available from our regional AT&T access tandem.

Valley Telephone Cooperative, Inc (VTCI), does originate calls using SIP connections in our network. STIR|SHAKEN is actively implemented within our IP- Network only and signs originating calls within the IP portions of VTCI's network using Metaswitch and Transaction Network Services.

Call Analytics & Enforcement:

All traffic originating within our network adheres to the following best practices to prevent robocalls.

- Valley Telephone Cooperative Inc. (VTCI) uses Metaswitch and TNS Call Guardian analytics, to actively monitor voice traffic, traffic trends and identify potential unlawful call activity.
- If determined by Metaswitch and TNS Call Guardian services of potential unlawful network activity or invalid call identity the following remedies from the customer will need to be performed.
 - If illegal robocalls are reasonably suspected, customers will be notified and will be needed to provide a remedy to reported problem. If no action is taken VTCI can suspend and/or terminate services to the customer.

Knowing Your Customers:

- VTCI maintains and validates Customer Information and Identity using customers address (physical and mailing), Social Security Number and when required if it is a business, Federal Tax ID and W9.

Best practices for Mitigation:

- All residential and business lines are to be only able to place calls originating from their own phone number.
- Businesses with ISDN-PRI or SIP trunk services can send spoofed numbers for legitimate business needs. This includes a main line number, DODs, toll free number, etc.
 - Caller ID and call records are reviewed when the service is installed to verify legitimate caller ID information.
 - Caller ID and call records are reviewed periodically to verify legitimate caller information, including every time a trouble ticket is generated for their voice services.

- All call records are reviewed in BSS/OSS where the originating number does not match an active account.
- An “untrusted” status can be assigned to the service in the switch so that caller id information is only created by the switch, not the subscriber’s equipment.
- Only numbers residing in our switch are assigned to residential and business lines.

Role In Call Chain

- Valley Telephone Cooperative Inc. (VTCI) is a voice service provider with active obligational implementation of STIR|SHAKEN on our IP portion of our network only.
- While VTCI, our subscribers, have selected our subsidiaries’ long-distance service. The IXC implements call screening via ANI verification to prevent intra-LATA, inter-LATA, and international toll calls from being placed by calling numbers that do not reside in our switch or with our subscribers.
- Non-IP network portions of the network relies on technology that is unable to initiate, maintain, carry, process and terminate SIP Calls

Traceback:

- Valley Telephone Cooperative Inc. (VTCI) is committed to cooperating with the Commission, law enforcement and registered traceback consortium and will cooperate with such agencies in investigating and stopping any illegal robocallers that are found using such services in our network.
- Valley Telephone Cooperative Inc. (VTCI) commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping illegal robocallers that use its service to originate, carry, or process illegal robocalls.

Robocall Mitigation Database Eligibility:

- Valley Telephone Cooperative Inc. (VTCI) has not been involved in any known law enforcement or regulatory investigation and has not, to our best knowledge, been prohibited from filing in the Robocall Mitigation Database.

Upstream Provider Knowledge:

- Valley Telephone Cooperative Inc. has reviewed all upstream carriers with which we receive originating traffic and confirmed they are listed in the Robocall Mitigation Database. VTCI has reviewed all upstream carriers filing and reviewed the carriers plans via RPM on how they plan to monitor their originating traffic for robocall mitigation.