

Robocall Mitigation Plan

Peoples Telecommunications LLC will follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group.

(<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

Traceback

Peoples Telecommunications LLC will respond to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and cooperate with such entities in investigating and stopping any illegal robocalls that use our service to originate calls.

Stir/Shaken Extensions

Peoples Telecommunications LLC is eligible for and is taking STIR/SHAKEN implementation extension received under 47 CFR 5 64.6304 because we have fewer than 100,000 voice subscriber lines.

All the voice traffic that originates on our network is subject to the robocall mitigation program described below.

Robocall Mitigation Program

Peoples Telecommunications LLC uses software provided by Sinch to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls. The software provides details reporting identifying suspected illegal robocalls and alerts us if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. We immediately investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls.

If we determine that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as appropriate.

Peoples Telecommunications LLC Robocall Mitigation Plan

Stir/Shaken Extension:

Peoples Telecommunications LLC is a Small Service Provider, serving fewer than 100,000 voice service subscriber lines and therefore qualifies for an extension until June 30, 2023 of STIR SHAKEN Implementation under 47 C.F.R. §64.6304(a), which reads:

Traceback Plan

Peoples Telecommunications LLC will respond to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and cooperate with such entities in investigating and stopping any illegal robocalls that use our service to originate calls.

Robocall Mitigation Program

Peoples Telecommunications LLC in conjunction with MACC currently trends all call records being sent to us, to determine data volumes falling outside the company-specific predetermined ranges. This is designed to catch data issues as quickly as possible, so the issues may be addressed, corrected, noted, and/or ignored. The volume ranges use a standard deviation process analyzing traffic over the preceding 4 months. The average volume is determined using company-specific percentages, and some companies routinely see volume fluctuations. This volume range is applied per MOU and messages by traffic type on originating access and terminating access. MACC's Quality Control Analysts will be providing information back to the company if there is a trending issue. Again, this information is only available on call records we are receiving for the company. Additionally, MACC will soon have a report available from the CABS process which identifies high-volume users who have exceeded an established threshold. Additional analysis will be done, and the customer will be contacted.