

Robocall Mitigation Policy

Date	Author/Title	Change Summary
October 17, 2024	Timothy Muldoon, Network Manager	Updated to include more detailed ownership information as Section VI and to add Company names and FRNs to Title

On Behalf of:	FRN
State Telephone Company	0005009725
State Telephone Long Distance Company, Inc. d/b/a State Tel – Athens	0004314068

This mitigation plan is submitted on behalf of State Telephone Company, an incumbent local exchange carrier and its wholly owned subsidiary State Telephone Long Distance Company, Inc. d/b/a State Tel – Athens, a competitive local exchange provider. Both companies operate in New York and share operations including their respective Robocall Mitigation Plans (“STC”).

I. Exemptions and Status

Extensions Received Under 47 C.F.R. §64.6304

STC 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).

STC is a member of NTCA who participates on the ATIS Non-IP taskforce working group which developed the (ATIS Solutions) non-IP call authentication solutions and serves as STC’s third-party representative on the ATIS Non-IP taskforce working group.

Status

STC does not currently support VOIP / SIP services in its network and is TDM at this time. Other than its own end user customers, STC does not support the use of its network for call origination by other carriers.

II. General Prohibition Against Illegal Robocalling

STC end user services are subject to restrictions contained in its published legal notices and all executed services orders include the requirement that service is provided pursuant to its terms of service (“TOS”) requirements.

Its existing TOS prohibit activities normally associated with Robocalling including, but not limited to:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable local, state, or federal law; using the STC service to engage in or in connection with fraudulent activities

In addition, the company is updating its TOS to expressly reference the prohibition on robocalling and all current subscribers will receive notice of the publication of its updated TOS.

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STC's end users are notified that STC may take action up to suspension or termination of service for violation of the TOS.

III. Robocall Mitigation

STC is a voice service provider and all calls that originate on its network are subject to the company's robocall mitigation plan. STC uses "Know Your Customer" to prevent the origination of robocall traffic on its network. All carriers to which STC are connected appear on the Robocall Mitigation Database and their traffic is subject to the same mitigation plan as that of its own end users.

Know Your Customer. STC is a small long established provider that maintains a close relationship with its subscribers. Its customers are generally "mom and pop" users and few of its total customer base have enough call paths to generate the high volume of traffic associated with robocalling allowing us to use targeted in-house analytics to monitor, alert and apprehend suspected robocalling activities.

STC has set a call path level based on its average customer size. The level – referred to as "large volume calling capability" – is subject to change.

STC has a screening for new customers requesting service at or above large volume calling capability levels:

- We will not deploy large volume calling capability as a residential service or at an address shown in the company records as being residential
- Business requesting large volume calling capability must provide a tax ID and verification as to the nature of the business
- We verify addresses to look for overlapping / multiple deployed voice path subscriptions
- An STC representative may visit the premise of the business to verify the number of users at the location is appropriate for the volume of calling

STC provides a subscription-based, non-commercial legal robocalling product and educates any subscribers or potential subscribers (such churches, school systems) regarding legal versus illegal robocalling activities to insure they are compliant in their use of the product.

IV. Traceback and Enforcement Cooperation

STC will actively participate the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG). STC commitments to respond within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium and will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

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V. Additional Certifications

Neither STC nor any entity which shares common ownership, management, directors, or control has been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

VI. Principals, Affiliates, Subsidiaries, and Parent Companies

State Tel of Athens is a wholly owned subsidiary of State Telephone Company. Owners of State Telephone Company with an excess of 10% ownership interest are the Regina W. McGrath trust, the James M. Warren trust, and the Nancy J. McOwen trust. The Trustee for all three trusts is Ann Sharpe, a US Citizen.

The directors of State Telephone are Joseph Warren, James Warren, Donald Persico, Ann Sharpe and Mark Evans, all US Citizens.