



Dunbarton Telephone Company Robocall Mitigation Plan

This document provides details on Dunbarton Telephone Company's robocall mitigation processes, procedures, and commitments as required by the Federal Communications Commission.

Dunbarton Telephone Company, Operating Company Number 0043, 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).

Dunbarton Telephone Company provides local service to 1350 customers, fewer than 100,000 voice subscriber lines. All customers are served on the non-IP portions of the network which relies on TDM technology that cannot initiate, maintain, or terminate SIP calls.

To meet the non-IP network criteria for the continuing STIR/SHAKEN extension §64.6303(a)(2), Dunbarton Telephone is an active member of the National Exchange Carrier Association, which is a member of the ATIS Non-IP Call Authentication Task Force which developed the non-IP call authentication solutions.

Robocall Mitigation Plan

All voice traffic that originates on Dunbarton's network is subject to the following Robocall Mitigation Plan.

Reasonable Steps

Dunbarton Telephone monitors all originating network traffic call detail records for suspicious or abnormal call pattern, volume, or activity. Calls that meet the below qualifying factors are analyzed internally to determine if the calls are legitimate or unlawful:

- High-volume voice network traffic
- Large bursts of calls in a short time frame
- Short duration calls
- Low average call duration
- Low call completions ratios
- Sequential dialing patterns
- Neighbor spoofing patterns

Investigation

Dunbarton investigates calls identified by internal traffic monitoring processes as suspicious or abnormal consistent with illegal robocalls.

As of this filing Dunbarton has not had any originating robocalls detected in its network by the internal analytics. Nor has Dunbarton received any complaints from its customers.

Enforcement

If it is determined that a Dunbarton customer is in violation of its acceptable use policy in any part of its network, Dunbarton will either warn the customer to stop such practices or terminate their service.

Know Your Customer

Dunbarton has procedures in place to prevent new and renewing customers from using our network to originate illegal robocalls. Dunbarton vets all residential and business customers, validates their identity, physical location, and contact personal information. Also, personally identifiable questions may be asked to provide additional security.

Contractual Provisions with End-users

All new customers acknowledge a statement on the service application which states users are prohibited from originating unwanted calls with the intent to defraud, cause harm, or wrongly obtain anything of value from the called party. If any customer is found in violation of the company's robocall mitigation policy the end users service may be terminated.

Upstream Provider Knowledge

Dunbarton knows all carriers from which it receives traffic. Dunbarton has confirmed that all carriers in which Dunbarton exchanges traffic are listed in the Robocall Mitigation Database.

Dunbarton has reviewed the connected carrier's RMPs to learn how the carriers monitor their originating traffic to mitigate illegal robocalls.

Roll In the Call Chain

Dunbarton Telephone is a voice service provider without the STIR/SHAKEN obligation in its Non-IP network because Dunbarton's entire network relies on technology that cannot initiate, maintain, carry, process, or terminate SIP calls.

Traceback

Dunbarton is committed to cooperation with all legal and legitimate industry inquiries to potential invalid or illegal traffic originating from its network. Dunbarton will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium fully and in a timely manner within 24 hours.

Robocall Mitigation Database Eligibility

Dunbarton has not been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling.

Dunbarton has not been prohibited from filing in the Robocall Mitigation Database (RMD).