



FENTON COOPERATIVE TELEPHONE COMPANY

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Fenton Cooperative Telephone Company Robocall Mitigation Plan

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Summary/Background

As part of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act, the Federal Communications Commission (FCC) adopted rules requiring voice service providers to implement Secure Telephone Identity Revisited (STIR) and Signature-based Handling of Asserted Information Using toKENs (SHAKEN) caller identification (ID) authentication technology in the Internet Protocol (IP) portions of their networks.

Fenton Cooperative Telephone Company is an Independent Local Exchange Carrier (ILEC) service provider. The FCC requires that all voice providers certify in the Robocall Mitigation Database that they have fully implemented STIR/SHAKEN or have instituted a Robocall Mitigation Plan to ensure that they are not originating illegal robocalls on their voice network. The FCC stated that a Robocall Mitigation Plan is sufficient if the detailed practices in the plan can “reasonably be expected to significantly reduce the origination of illegal robocalls” and the voice provider complies with the practices it describes in its filings.

Purpose

Fenton Cooperative Telephone Company is dedicated to stopping illegal calls from originating in our network and monitoring the calls terminating into our network following FCC regulations.

This document defines Fenton Cooperative Telephone Company's Robocall Mitigation plan.

VOICE CUSTOMER VERIFICATION/NEW and RENEWING CUSTOMERS

The accurate identification of a voice subscriber in the STIR/SHAKEN, and Robocalling Mitigation environment is tied to a telephone number-based caller identity associated with that subscriber. A subscriber is an entity that has a business relationship with Fenton Cooperative Telephone Company in which we originate/terminate/transit voice calls on behalf of the subscriber.

Fenton Cooperative Telephone Company requires all voice subscribers to have a signed contract in the form of a **Communications Services Workbook**. Preceding a signed contract, Fenton Cooperative Telephone Company confirms a subscriber's identity, by vetting the subscriber directly. The vetting process includes collecting information such as:

- Verifying a physical address
- Verifying a contact person who is a decision maker regarding the service
- Verifying the Customer's voice needs and understanding the nature of the Customer's business

ROBOCALL MITIGATION TECHNICAL SPECIFICATIONS

Fenton Cooperative Telephone Company uses Aureon Network Services, Inc. as its CIDA (Caller ID Authentication) provider. Aureon Network Services, Inc. uses TransNexus as its STI-PA Approved Software Vendor/ Robocall Mitigation Approved Software Vendor.

Originating Robocall Mitigation: Fenton Cooperative Telephone Company's outbound call Robocall Mitigation software uses a curated list of high-risk phone numbers and detects invalid numbers. If the calling number has been reported as spam, the calling number will be prevented from completing outbound calls.

Terminating Robocall Mitigation: Fenton Cooperative Telephone Company's inbound call Robocall Mitigation software monitors capabilities and systems in place to analyze high-volume voice network traffic to identify and monitor patterns consistent with robocalls. Our monitoring portal uses analytics and alerts on calling patterns that include unusual spikes, attempted use of non-validated Automatic Number Identifications (ANIs) to detect patterns consistent with illegal robocalls and attempts at illegal call spoofing.

LOCAL/EAS MITIGATION

Fenton Cooperative Telephone Company has a limited number of trunks, so any increase on switch traffic will cause our technician to investigate.

KNOW YOUR UPSTREAM PROVIDER

Fenton Cooperative Telephone Company knows all the voice customers from which it interconnects with. Fenton Cooperative Telephone Company uses Aureon Network Services' CIDA product that monitors the status of its voice customers daily in relation to any certification violations flagged in the TransNexus software. Fenton Cooperative Telephone Company monitors FCC Blocking Orders as described in the Traced Act Fourth Report and Order and is fully capable of blocking voice traffic originating or terminating into our voice customers.

TRACEBACK RESPONSE

Fenton Cooperative Telephone Company will follow the industry best practices and fully cooperate as required by The Industry Traceback Group (ITG). We use Aureon Network Services, Inc.'s CIDA product that has a formal trouble ticket process in place to update and track individual traceback requests and will utilize our 24/7 Network Operations Center (NOC) to comply within 24 hours to any traceback requests.

BLOCKING

Fenton Cooperative Telephone Company uses Aureon Network Services, Inc.'s CIDA system that is capable of initiating the Do Not Originate (DNO) requests it receives from the ITG.

ROBOCALL MITIGATION PLAN UPDATES

All of the calls that Fenton Cooperative Telephone Company carries or processes on its network are subject to a robocall mitigation plan consistent with 47 C.F.R. § 64.6305(c), any prior certification has not been removed by Commission action and Fenton Cooperative Telephone Company has not been prohibited from filing in the Robocall Mitigation Database by the FCC.

Fenton Cooperative Telephone Company received an extension under 47 C.F.R. § 64.6304(d) for non-IP networks, and as to the portions of the network subject to the extension. Fenton Cooperative Telephone Company's CIDA Robocall Mitigation Provider Aureon Network Services, Inc. is working with TransNexus to implement an out-of-band non-IP caller identification authentication solution in compliance with 47 C.F.R. § 64.6303(c).

In the prior two years, Fenton Cooperative Telephone Company has not been the subject of a formal FCC, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrong doing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation plan description.

Fenton Cooperative Telephone Company understands that this plan and industry best practices must evolve to respond to the ever-changing nature of illegal robocalling. Fenton Cooperative Telephone Company will continuously improve our internal processes; to parallel future changes in the robocalling mitigation eco-system.