

North Texas Telephone Company Robocall Mitigation Program

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

North Texas Telephone Company has received the following extension of the STIR/SHAKEN implementation deadline under §64.6304 of the FCC's rules: (1) the non-IP networks extension (§64.6304(d)).

Specific Reasonable Steps Taken to Avoid Originating Illegal Robocall Traffic

What follows are the specific reasonable steps North Texas Telephone Company has taken to avoid originating illegal robocall traffic.

- North Texas Telephone Company has a “know your customer policy” to prevent your services from being used to originate illegal traffic. We extensively investigate potential business customers seeking access to high-volume origination services prior to providing service by collecting information such as their physical business location, contact person(s), state or country of incorporation, federal tax ID, and the general nature of their business.
- North Texas Telephone Company requires all business customers to sign contracts that contain provisions that allow for termination in the event high-volume origination services are abused by new and renewing customers. North Texas Telephone Company will not hesitate to enforce them if necessary.
- North Texas Telephone Company exercises due diligence before accepting traffic from an upstream provider by collecting said provider's physical business location, contact person(s), and nature of their business. All contracts with upstream providers contain provisions that allow for termination of access in the event of a high volume of illegal traffic.
- While not using direct analytics software, North Texas Telephone Company staff frequently monitor switched traffic volume and logs for abnormal patterns. All upstream providers that North Texas Telephone Company interconnects, monitor traffic with automated systems and will notify North Texas Telephone Company of any and all high volume, illegal activity.
- North Texas Telephone Company 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.

Status of STIR/SHAKEN Implementation

As of May 31, 2023, North Texas Telephone Company's network only uses non-IP technology that cannot initiate, maintain, and terminate SIP calls, making it incompatible with STIR/SHAKEN. Thus, North Texas Telephone Company is unable to implement STIR/SHAKEN in any part of its network at this time and must continue to avail itself of the non-IP networks extension under §64.6304(d) of the FCC's rules. North Texas Telephone Company will implement a call authentication protocol for voice calls delivered over the non-IP portions of its network when such a protocol is fully developed and finalized by industry standards and the necessary equipment and software is available on the commercial market.