

Oklatel Communications, Inc. Robocall Mitigation Program

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

Oklatel Communications, Inc. 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 Oklatel Communications, Inc. has taken to avoid originating illegal robocall traffic.

- Oklatel Communications, Inc. 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.
- Oklatel Communications, Inc. 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. Oklatel Communications, Inc. will not hesitate to enforce them if necessary.
- Oklatel Communications, Inc 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, Oklatel Communications, Inc staff frequently monitor switched traffic volume and logs for abnormal patterns. All upstream providers that Oklatel Communications, Inc interconnects, monitor traffic with automated systems and will notify Oklatel Communications, Inc of any and all high volume, illegal activity.
- Oklatel Communications, Inc 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, Oklatel Communications, Inc.'s network only uses non-IP technology that cannot initiate, maintain, and terminate SIP calls, making it incompatible with STIR/SHAKEN. Thus, Oklatel Communications, Inc. 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. Oklatel Communications, Inc. 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.