



Logan Telephone Cooperative Inc., dba LTC Connect, OCN 0413
10725 Bowling Green Rd Auburn, KY 42206

Robocall Mitigation Plan

This Robocall Mitigation Plan describes the specific reasonable steps that Logan Telephone Cooperative Inc., dba LTC Connect, has taken to avoid the origination, carrying, or processing of illegal robocall traffic on its network.

Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Robocalls

LTC Connect has a “know-your-customer” policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. Specifically, LTC Connect follows the [best practices for vetting caller identity](#) described by the NANC Call Authentication Trust Anchor Working Group. In addition, although LTC Connect’s customers generally do not generate a high volume of calls, were the company to receive a request for high-volume origination services, we would exercise caution and extensively investigate such customers before granting access to the services.

“Know-Your-Upstream Provider” Procedures

Most of the connections that LTC Connect has with upstream providers have been in place for many years and we know these companies very well. However, LTC Connect exercises due diligence before accepting traffic from any new upstream provider as we seek to ensure that such providers are not using LTC Connect to carry or process a high volume of illegal traffic. Specifically, LTC Connect collects information such as the upstream provider’s physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of their business.

“Know-Your-Customer” Procedures

LTC will, upon application for service by an individual, collect the following information: name, date of birth, social security number, service address, billing address (if different), a copy of a valid US driver's license, and will run a credit check to evaluate account risk.

LTC will, upon application for service by a business, church or nonprofit entity, collect the following information as appropriate for the organizational structure: registered business name, EIN or SSN, W9 where applicable, service address, billing address (if different) and valid US driver's license for the signing party on the account.

Use of Call Analytics Systems

LTC Connect uses software provided by TransNexus to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts us if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database, or has a poor reputation. LTC Connect immediately investigates any identified calls to determine if the caller was attempting to originate unlawful robocalls. If we determine that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as appropriate.

Commitment to Respond to Traceback Requests

LTC Connect 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 any illegal robocallers that use its services to originate, carry, or process illegal robocalls.

STIR/SHAKEN Implementation

As of May 8th, 2023, LTC Connect has implemented and tested STIR/SHAKEN on all SIP-routed traffic originating on our network. We use TransNexus as our trusted STIR/SHAKEN vendor, with all originating outbound traffic that is routed via SIP trunking doing so with full A-level attestation. A substantial portion of LTC Connect's outbound voice traffic remains TDM-based, as is 100 percent of our inbound traffic, as we have been unable to establish SIP trunks with the majority of peering carriers.

Robocall Mitigation Database / FCC CORES Update Requirement Compliance

Following any material changes to the organization, LTC will update, within a ten-business-day window, the Robocall Mitigation Database, and/or the FCC CORES to reflect the new contact information, ownership, or control. In the event of a change to the specifics of the adopted and implemented robocall mitigation program, the Robocall Mitigation Database filing will be updated accordingly within the same ten-business-day allowance window.