

SkyLine Telephone Membership Corporation and SkyBest Communications, Inc. Robocall Mitigation Program

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

SkyLine Telephone Membership Corporation along with its subsidiary SkyBest Communications, Inc. (SkyLine/SkyBest) has received the following types of extensions of the STIR/SHAKEN implementation deadline under §64.6304 of the FCC's rules: (1) the small voice service providers extension (§64.6304(a)), and (2) the non-IP networks extension (§64.6304(d)). As of March 2023, SkyLine/SkyBest had a total of 23,237 access lines and with an estimation of 18% of our traffic over TDM which further demonstrates the companies eligibility under §64.6304 and (§64.6304(a)). SkyLine/SkyBest is compliant prior to the June 30, 2023 deadline for STIR/SHAKEN in our IP network and will continue to follow mitigation protocols in both the non-IP and IP network as demonstrated below.

Specific Reasonable Steps Taken to Avoid Originating Illegal Robocall Traffic

What follows are the specific reasonable steps SkyLine/SkyBest has taken to avoid originating illegal robocall traffic.

1. TraceBack:
 - a. SkyLine/SkyBest is a member of US Telecom and actively participates in the traceback community including the Federal Communications Commission, law enforcement and the industry traceback consortium.
 - b. SkyLine/SkyBest has procedures in place in the event of a traceback request including responding to requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium fully and in a timely manner within twenty-four (24) hours.
 - c. All peering customers are required to be U.S. based and have an active FRN along with being a 499-A contributor.
2. Call Analytics:
 - a. SkyLine/SkyBest is currently working with Ribbon Communications and has completed the Stir/Shaken Certificate process.
 - b. Ribbon Communications has completed a hardware upgrade to all Session Border Controllers (SBC) capable of supporting Stir/Shaken.
 - c. Ribbon Communications completed Stir/Shaken in June 2022.
3. Audit and Monitoring:
 - a. Metrics such as Automatic Message Accounting (AMA), Call Logging (CLGS), and Call History Server (CHS) are monitored for behavior that is consistent with illegal robocalling.
 - b. For software customers that are delivering legal solicited calls, such as appointment reminders, notifications and/or priority updates, customer complaints and call recordings are monitored for unlawful activity.
 - c. SkyLine/SkyBest routinely ingests FCC complaints and works directly with customers to improve their behavior or remove the customer from our network if call pattern does not improve.
 - d. SkyLine/SkyBest monitors subscribers of unlimited long distance to determine an increase in originating long distance dialing for the potential of unlawful, inappropriate usage.

4. Knowledge of Upstream Providers:
 - a. SkyLine/SkyBest knows all carriers from which it receives traffic.
 - b. SkyLine/SkyBest has confirmed that connecting carriers are registered in the Robocall Mitigation Database, and has reviewed the connected carrier's Robocall Mitigation Plan to ensure they have proper protocols in-place to monitor originating traffic in the mitigation of illegal robocalls.
 - c. SkyLine/SkyBest now includes traceback and prohibited traffic language in all contractual agreements with carriers.
5. Customer Practices (Know-Your-Customers):
 - a. Customer Verification:
 - i. Customers establishing service with SkyLine/SkyBest must show proof of identity during the application process. Identification can be used to determine if the customer is a new customer or a previous subscriber to SkyLine/SkyBest service(s).
 - b. Membership Documentation
 - i. Business and residential membership forms, which are signed by all new SkyLine subscribers, include a statement regarding the company's zero tolerance of illegally and/or fraudulent activity. Signed forms are then digitally stored on the customer's account.
 - c. Letter of Agency (LOA)
 - i. New customers signing up for SkyBest phone and/or Internet, are required to initial and sign the SkyBest LOA which includes an illegal/fraudulent activity disclaimer. Upon signing, the LOA is digitally stored on the customer's account.
 - d. Website
 - i. The company website, www.skybest.com, offers educational information related to robocalls along with a disclaimer advising customers that illegal and/or fraudulent dialing and activity will not be tolerated by SkyLine/SkyBest.
 - e. Do Not Call Registry
 - i. Information, including contact details, for the Do Not Call Registry is listed on the company website and in the printed directory.
 - ii. Annual bill messages are included in customer statements advising of the Do Not Call Registry.
 - iii. Members of Customer Operations and Business Sales teams are equipped with information regarding the Do Not Call Registry, including how to assist customers in signing up.
 - f. Annual Notification
 - i. Annual notification of SkyLine/SkyBest's participation in Stir/Shaken and the mitigation of robocalling will be shared with customers.
6. Investigations
 - a. SkyLine/SkyBest is not currently being, nor has it been, investigated by the FCC and/or law enforcement in relation to robocalling, spoofing, and/or a deficient Robocall Mitigation Plan filing.
 - b. SkyLine/SkyBest has not been prohibited from filing in the Robocall Mitigation Database.

Principals, Affiliates, Subsidiaries, and Parent Companies

Kimberly Shepherd serves as CEO of SkyLine Telephone Membership Corporation an ILEC company.

SkyBest Communications, Inc., a CLEC company, is a subsidiary of SkyLine Telephone Membership Corporation (SkyLine). SkyLine owns 100% of SkyBest Communications, Inc. (SkyBest). SkyBest owns 100% of Loretto Telephone Company, Inc. (ILEC). Loretto Telephone Company, Inc. owns 100% of Loretto Communication Services, Inc. (CLEC).

Status of STIR/SHAKEN Implementation

SkyLine/SkyBest has STIR/SHAKEN technology in place for the authentication and verification of voice traffic originating and terminating on the IP portions of the company's network that supports SIP calls. In addition, SkyLine/SkyBest will have implemented a call authentication protocol for voice calls delivered over the non-IP portions of its network that do not use SIP technology when such a protocol is fully developed and finalized by industry standards and the necessary equipment and software is available on the commercial market. SkyLine/SkyBest is represented by NTCA who participates in the research and future discovery of a non-IP caller identification solution. Until such technology is in-place, SkyLine/SkyBest has received a non-IP networks extension under §64.6304(d) of the FCC's rules, which provides the company with a continuing extension of the STIR/SHAKEN implementation deadline for those portions of the company's network that cannot initiate, maintain, and terminate SIP calls.