

Robocall Mitigation Plan for Palmerton Telephone

Revised 2/23/2024

1 Overview

Pursuant to the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act, the FCC has adopted rules requiring voice service providers to implement STIR/SHAKEN technology in their networks.

As part of its Robocall Mitigation Database filing updates required under the FCC's Sixth Report and order and Further Notice of Proposed Rulemaking, FCC 23-19 (Mar. 17, 2023), this document will describe Palmerton Telephone Company (herein referred to as PTC) certification and robocall mitigation plan in preventing unlawful robocalls from originating on its network.

PTC has completed registration with Iconectiv for STI-PA services to obtain Service Provider Code Tokens to implement with Sinch's Robocall Mitigation products.

2 Purpose

Establish a plan for PTC that complies with TRACED ACT and execute the plan as described.

3 Policy Against Illegal Robocalling

PTC's service agreements refer to our policies, terms and conditions and terms of service located on our website. The Terms and Conditions have been updated to include illegal robocalling actions. New customers, renegotiated contracts and contract extensions will include provisions for call blocking, suspension, and termination of service for illegal Robocalling.

4 Traceback

PTC commits, as per 47 CFR 64.1200(n)(1)(i), to fully respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium within 24 hours of receipt of such.

5 Mandatory Blocking Following Commission Notification

PTC, upon notification from the Commission, will block or cease carrying or transmitting the reported illegal traffic. The Commission makes clear that nothing in this rule precludes the originating provider from taking steps other than blocking the calls to eliminate this traffic, provided it can ensure that the method has the same effect as ongoing blocking. PTC will ensure that all related offending accounts are terminated nor permit the customer to re-engage in its services.

6 Know Your Customer

PTC is a long-established, small provider that maintains relationships with its customers. Any new customers requesting excessive call paths will be screened for legitimate usage needs.

- a. PTC requires all customers to provide valid identification including address, service location and credit approval.

7 Know Your Upstream Provider

PTC works closely with vetted contracted carrier service providers. Each of PTC's contracted carrier service providers is confirmed as listed in the RMD with Completed Stir/Shaken implemented.

8 STIR/SHAKEN Implementation

PTC has completed registration with iConnectiv for STI-PA services. PTC is utilizing SINCH for all SIP traffic and is utilizing Neustar as part of our Robocalling Mitigation Plan for the remaining amount of TDM traffic. All outbound SIP calls originating from our network are signed by our token via SINCH's network who acts as our STI-PA, to ensure that all SIP calls originating from our network are verified and authenticated.

9 Monitoring

- a. Robocall mitigation through SINCH Analytics event policies
- b. Additional monitoring procedures include quantity and quality of completed and failed calls through network notifications.
- c. Monitoring active calls daily for duration, quantity, and repetition.
- d. Limits for CPS (calls per second) as well as call path limits
- e. Geo Fraud profiles block IP traffic from non-US addresses unless specifically requested to use a non-US address for remote access.
- f. Weekly and monthly reporting data provides volume of completed and failed calls per customer,

10 Investigating Suspicious Traffic

If suspicious traffic is encountered via monitoring or reported, the call volume will be investigated for legitimacy. When the details are confirmed, the customer responsible will be notified. PTC will work with the customer to resolve the traffic issue. If there is no satisfactory resolution, steps will be taken to suspend or terminate services