

Robocall Mitigation Plan for Illinois Electric Cooperative

February 26, 2024

The Federal Communications Commission (“FCC”) has directed certain providers to upload a Robocall Mitigation Plan to the Robocall Mitigation Database portal that describes the specific reasonable steps the provider has taken to avoid, as applicable, the origination, carrying, or processing of illegal robocall traffic as part of its robocall mitigation plan. Specifically, the FCC requires the following to be included in robocall mitigation plans: (1) voice service providers must describe how they are meeting their existing obligation to take affirmative, effective measures to prevent new and renewing customers from originating illegal calls; (2) non-gateway intermediate providers and voice service providers must, like gateway providers, describe any “know-your-upstream provider” procedures in place designed to mitigate illegal robocalls; and (3) all providers must describe any call analytics systems they use to identify and block illegal traffic including whether they use a third-party vendor or vendors and the name of the vendor(s). This Robocall Mitigation Plan is being filed in accordance with the above-referenced requirements.

Entities Covered by this Filing

Illinois Electric Cooperative

STIR/SHAKEN Implementation

Illinois Electric Cooperative offers voice services to its customers. **Illinois Electric Cooperative** can initiate, maintain, and terminate SIP calls throughout its network. As such, **Illinois Electric Cooperative** has fully implemented STIR/SHAKEN in its network.

Robocall Mitigation Plan

Illinois Electric Cooperative takes steps to prevent or avoid the origination of illegal robocalls and has implemented specific measures to detect and prevent illegal robocalls on its network.

Illinois Electric Cooperative has procedures in place to prevent new and renewing customers from using the **Illinois Electric Cooperative** network to originate illegal robocalls. **Illinois Electric Cooperative** thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services. **Illinois Electric Cooperative** utilizes the “know-your-customer” screening process to mitigate the use of its network to originate illegal robocalls.

Illinois Electric Cooperative customers are subject to enforceable terms of use and an acceptable use policy for use of all **Illinois Electric Cooperative** provided services. These policies prohibit use of **Illinois Electric Cooperative** services for any purpose other than the intended purpose, including use of the services for criminal activity or use in a manner inconsistent with applicable laws, rules, and regulations.

Illinois Electric Cooperative has implemented internal monitoring and reporting procedures designed to detect and prevent fraudulent traffic on its network.

Specifically, all lines and trunks served on **Illinois Electric Cooperative**'s network are provisioned with a single telephone number, or a specific set of telephone numbers that are assigned for the use of a single customer. These telephone numbers have been assigned only for the use on the lines or trunks provisioned for that specified customer. All calls originated by any customer on **Illinois Electric Cooperative**'s network must carry a Caller ID limited to one of the telephone numbers specifically assigned to that customer. Any attempt to use a number not assigned to that customer when originating a call will be blocked by **Illinois Electric Cooperative**'s network because of these controls. This blocking occurs when a customer attempts to use a telephone number for which it has not been assigned, whether the attempt was made directly by the customer or as a result of some malicious intrusion of the customer's equipment.

Further, **Illinois Electric Cooperative** can identify the specific customer that originates any call on its network. Thus, **Illinois Electric Cooperative** is prepared to respond to any inquiries regarding any calls that have originated on its network and meet its obligations.

Illinois Electric Cooperative has completed the "know-your-customer" screening process for the carriers to which it interconnects. **Illinois Electric Cooperative** is subject to provisions in its interconnection and commercial agreements that require **Illinois Electric Cooperative** to take steps to prevent illegal robocalls on its network.

If **Illinois Electric Cooperative** has a reasonable basis to believe that a customer is originating illegal robocalls, it will require the customer to remedy the problem and, if effective action is not taken, service to the customer may be suspended and/or terminated.

Illinois Electric Cooperative utilizes call analytics software from Neustar's (part of Transunion) to assist with the detection of illegal robocalls on its network. As part of Neustar's RoboCall Mitigation, **Illinois Electric Cooperative** tagging the CNAM of numbers as Fraud when the originating number is not part of the North American Numbering Plan (NANPA) or a known robocall offender and tagging Robo or Spam based on Neustar's scoring and analytics.

Responding to Traceback Requests and Cooperation with State and Federal Regulators

Illinois Electric Cooperative commits to respond to traceback requests and to cooperate with investigating and stopping illegal robocalls as necessary. **Illinois Electric Cooperative** will respond to traceback requests received from the Industry Traceback Group, the FCC, or law enforcement within 24 hours as required under FCC rules.

Illinois Electric Cooperative also will cooperate with state and federal regulators to prevent, detect, and mitigate illegal robocalls as applicable. **Illinois Electric Cooperative** will: respond to valid law enforcement requests; provide relevant non-proprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities; and implement

mandated robocall mitigation procedures to the fullest extent possible with the goal of maximizing the mitigation of illegal robocalls.

Principals, Affiliates, Subsidiaries, and Parent Companies

Thomas Meehan III President
Illinois Rural Telecommunications

As of February 26, 2024 the corporate officers of **Illinois Electric Cooperative** are:

Thomas Meehan III	President
Kevin Brannan	Secretary
Jim Freeman	Treasurer
Julia Eberlin	Vice President