

PANHANDLE TELEPHONE COOPERATIVE, INC.
ROBOCALL MITIGATION PLAN

PTCI, Operating Company Number 2016 and its affiliate PTSI, Operating Company Number 6944 and 468B, is eligible for the continuing STIR SHAKEN implementation deadline under FCC rules §64.6304(a)(2) and §64.6304(d).

PTCI qualifies for the continuing extension of the STIR SHAKEN implementation deadline as a small voice service provider (§64.6304 (a)(2)) that has non-IP portions within its network §64.6304(d).

PTCI provides local service to over 3,000 customers, fewer than 100,000 voice subscriber lines. The vast majority of these customers are served on the non-IP portions of PTCI's network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

To meet the non-IP network criteria for the continuing STIR SHAKEN extension (§ 64.6303 (a)(2)), PTCI is a member of NTCA. NTCA participates on the ATIS Non-IP taskforce working group which develops non-IP call authentication solutions. NTCA is serving as PTCI's third party representative on the ATIS Non-IP taskforce working group.

Consistent with § 64.6303 (a)(1), PTCI is ready to upgrade its entire network to allow for the initiation, maintenance, and termination of SIP calls and fully implement the STIR/SHAKEN framework. PTCI has contacted all of its connected carriers and requested to convert the Non-IP connections to IP connections. The carriers stated they cannot support IP connections at this time.

PTCI also originates calls via SIP connections within its network. PTCI has registered with the Policy Administrator and is an authorized service provider in the STIR/SHAKEN ecosystem. PTCI signs the calls originating on the IP portions of PTCI's network.

ROBOCALL MITIGATION PLAN

All voice traffic that originates on PTCI's network is subject to the following Robocall Mitigation Plan.

PTCI has contracted with Ribbon Call Trust Services to provide robocall analytics and reputation scoring of our network's outbound traffic. The vendor uses software to monitor outbound voice traffic in real time and provides detailed reporting identifying if our network originates 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. PTCI has access to the vendor's portal and receives notifications about telephone numbers originating suspected illegal robocalls on its network. The software's identification of suspected illegal robocalls and alerts helps prevent the origination of illegal robocalls.

In addition, all customers sign a service agreement when new service is activated or existing service is renewed. The service arrangement includes notice that PTCI prohibits use of its network for the initiation of fraudulent spoofing and robocalls. If end users are found in violation of the service terms, the end user's service may be terminated.

PTCI knows all the carriers from which it receives traffic. PTCI proactively monitors incoming traffic from all connected carriers for suspicious call patterns indicative of illegal robocall activity. The connected carriers are made aware of any suspicious or illegal traffic identified and notified, that if the traffic does not cease, the calls may be blocked from entering PTCI's network to terminate.

PTCI has confirmed that all carriers in which PTCI exchanges traffic and from which PTCI receives traffic are listed in the Robocall Mitigation Database.

All interconnection agreements PTCI has with its competitors includes a commitment to follow the FCC's traceback rules.

PTCI has reviewed the connected carrier's RMPs to learn how the carriers monitor their originating traffic to mitigate illegal robocalls.

PTCI is a voice service provider with a STIR/SHAKEN implementation obligation on the IP-Portions of its network which serves over 200 end-users. PTCI is also a voice service provider without a STIR/SHAKEN obligation on the Non-IP portions of its network because that portion of PTCI's network relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

PTCI commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to originate calls. PTCI will respond to traceback 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.

PTCI has not been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling.

PTCI has not been prohibited from filing in the Robocall Mitigation Database (RMD).

PTCI posts information on its website to educate customers on how to protect themselves from becoming a victim of unlawful robocalls and a process to report complaints related to robocall activity.