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Sully Telephone Association, Inc. Robocall Mitigation Plan

This document provides details on Sully Telephone Association's robocall mitigation processes, procedures, and commitments as required by the Federal Communications Commission.

Sully Telephone's, Operating Company Number 1306, is eligible 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).

Sully Telephone provides local service to 650 customers, fewer than 100,000 voice subscriber lines. All customers are served on the non-IP portions of the network which relies on TDM technology that cannot initiate, maintain, or terminate SIP calls.

To meet the non-IP network criteria for the continuing STIR/SHAKEN extension §64.6303(a)(2), Sully Telephone is an active member of the National Exchange Carrier Association, which is a member of the ATIS Non-IP Call Authentication Task Force which developed the non-IP call authentication solutions.

Robocall Mitigation Plan

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

Reasonable Steps

Sully Telephone monitors all originating network traffic call detail records for suspicious or abnormal call pattern, volume, or activity. Calls that meet the below qualifying factors are analyzed internally to determine if the calls are legitimate or unlawful:

- High-volume voice network traffic
- Large bursts of calls in a short time frame
- Short duration calls
- Low average call duration
- Low call completions ratios
- Sequential dialing patterns
- Neighbor spoofing patterns

Sully retains the originating and terminating call detail usage records for a minimum of 18 months.

Investigation

Sully investigates calls identified by internal traffic monitoring processes as suspicious or abnormal consistent with illegal robocalls.

As of this filing Sully has not had any originating robocalls detected in its network by the internal analytics. Nor has Sully received any complaints from its customers.

Enforcement

If it is determined that a Sully customer is in violation of its acceptable use policy in any part of its network, Sully will either warn the customer to stop such practices or terminate their service.

Know Your Customer

Sully has procedures in place to prevent new and renewing customers from using our network to originate illegal robocalls. Sully vets all residential and business customers, validates their identity, physical location, and contact personal information. Also, personally identifiable questions may be asked to provide additional security.

Contractual Provisions with End-users

All new customers acknowledge a statement on the service application which states users are prohibited from originating unwanted calls with the intent to defraud, cause harm, or wrongly obtain anything of value from the called party. If any customer is found in violation of the company's robocall mitigation policy the end users service may be terminated.

International Call Originators

The Provider is not currently an international voice services provider. If at any time the Provider does sell its services to customers which are international call originators using North American Numbering Plan resources, it will familiarize itself with and develop best practices for fulling vetting such customers and performing telephone number validation on all international originated calls.

Upstream Provider Knowledge

Sully knows all carriers from which it receives traffic. Sully has confirmed that all carriers in which Sully exchanges traffic are listed in the Robocall Mitigation Database.

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

Included as part of **Appendix A** to this Robocall Mitigation Plan document is a list of the Provider's current, immediate "Upstream Provider(s)" along with the contact information for each.

Roll In the Call Chain

Sully Telephone is a voice service provider without the STIR/SHAKEN obligation in its Non-IP network because Sully's entire network relies on technology that cannot initiate, maintain, carry, process, or terminate SIP calls.

Traceback

Sully is committed to cooperating with all legal and legitimate industry inquiries to potential invalid or illegal traffic originating from its network. Sully 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 24 hours.

Robocall Mitigation Database Eligibility

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

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

Third-Party Analytics

The Provider also uses third-party analytics to further assist and prevent the origination of illegal robocalls on its network. Included in **Appendix A** is the name of the vendor(s) used along with a description of the call analytics system(s) used to identify and block illegal robocall traffic.

Appendix A

Traceback Request Single Point of Contact:

Name: John Williams

Title: General Manager

Phone Number: 641-594-2905

Email address: johnw@sullytel.com

Upstream Provider Information:

Name of Upstream Provider: Aureon

Nature of Business: Tandem Switch Provider, Wholesale Long-Distance Provider

Network Location of Upstream Provider: West Des Moines, IA

Name of Contact: Chris Davis

Title: Regulatory Manager

Phone Number: 515-830-0408

Email Address: chris.davis@aureon.com

Call Analytics Vendor Name and Description of System:

Name of Vendor: TransNexus

Description of the call analytics system

Sully Telephone utilizes a third-party "Analytics" platform jointly provided by TransNexus and Aureon to support the effectiveness of its Robocall Mitigation Plan. This includes, as examples, the use of "Telecom Fraud Prevention" and "Robocall and Telephone Denial of Service (TDos) Prevention" services, which include more specifically the use of the following methods/tools as a means of preventing and blocking fraudulent and illegal robocalls on its network: the use of CDRs and related reports for determining mitigation actions; use of SIP Analytics enabling real time traffic analysis and detection and mitigation of robocalls at origination; use of blacklisting and whitelisting to mitigate calls with specific attributes; use of CAPTCHA gateway services to distinguish whether calls are from humans or auto dialers; use of a "Shield" database that screens calls at origination for calling numbers that are invalid, high-risk, or appear on "Do Not Originate" lists; and use of reputation look up services on calling numbers at origination.