

October 4, 2024

STIR/SHAKEN IMPLEMENTATION & ROBOCALL MITIGATION PLAN (RMP)

Pursuant to 47 C.F.R. § 64.6305, Inland Cellular submits this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls. This report describes the status of its implementation of STIR/SHAKEN and the practices and procedures Inland Cellular has in place to mitigate illegal robocalls as of October 3, 2024. Inland Cellular may modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time in order to respond to changes in its business, its capabilities and its needs.

STIR/SHAKEN Implementation

Inland Cellular will comply fully with all conditions set forth in the FCC'S 2020 Report and Order mandating the implementation of the STIR/SHAKEN framework, as well as with the Commission's rules and policies more generally.

Inland Cellular is implementing STIR/SHAKEN through use of the TNS Call Guardian Authentication Hub. This is a managed end-to-end call authentication solution that fully satisfies the FCC's STIR/SHAKEN requirements. It provides a standardized approach to call authentication and verification (STIR – RFC 8224, RFC 8225, RFC 8226 and SHAKEN – ATIS-1000074-E, ATIS-1000080, ATIS-1000082).

Inland Cellular has implemented this solution in the IP portions of its network on October 3, 2024.

- ☐ My traffic is fully attested.
- ☒ My traffic is partially attested.
- ☐ None of my traffic is yet attested.

All of Inland Cellular's SIP traffic is fully attested. Inland Cellular still currently utilizes TDM trunks with several providers. This traffic is not attested.

Robocall Mitigation Plan

This Robocall Mitigation Plan describes the specific measures that Inland Cellular has implemented to detect and prevent illegal robocalls on its network as of October 3, 2024.

Inland Cellular will periodically evaluate the risks it faces, the effectiveness of its policies and procedures, and its capabilities to support the measures described. Should the company determine that changes are appropriate, its practices may differ from those described below.

Risk Assessment. Inland Cellular is a voice service provider offering a variety of voice calling services. Its customers generally do not originate high volume calls and Inland Cellular has not received information suggesting that robocalls are originated on its network. Therefore, Inland Cellular does not consider its network at high risk of originating illegal robocalls.

SPECIFIC MEASURES TO IDENTIFY AND PREVENT ILLEGAL ROBOCALLS

Customer Due Diligence: Inland Cellular conducts due diligence on new and renewing customers, confirming the customer's identity and, if it is a business, its incorporation documents. The Company confirms the customer's service address for all customers.

- Inland Cellular verifies customer's credit history and business reputation prior to providing service.
- Inland Cellular verifies customer information when contracts are renewed or services are added.
- Inland Cellular verifies the customer's identity and their right to use the telephone number presented on calls.
- Inland Cellular has policies that define the circumstances by which it will deny, suspend, or terminate service to a customer.

Measures to Prevent or Avoid the Origination of Illegal Robocalls

- Inland Cellular also has in place policies designed to detect and prevent fraudulent traffic on its network.
- Inland Cellular uses TNS Call Guardian analytics technologies and services to monitor traffic on its network and identify potentially unlawful call origination activity. If Inland Cellular 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, Inland Cellular can suspend and/or terminate service to the customer.
- Inland Cellular verifies that the direct intermediate carriers that are used by Inland Cellular are in the FCC RMD and does not accept traffic from intermediate carriers who are not in the RMD.

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- Inland Cellular blocks the following types of calls by default:
 - ☑ Calls originating from invalid numbers per FCC Order [2017 Call Blocking Order]
 - ☑ Calls from DNO numbers as per FCC Order [2017 Call Blocking Order]
- Inland Cellular also blocks the following types of calls:
 - ☑ As an originating service provider and/or intermediate carrier that is immediately downstream from a bad actor, will block traffic from the bad actors when notified by the commission

Responding to Traceback Requests

- Inland Cellular has designated an individual as a dedicated point of contact for addressing traceback requests, and a backup person to that individual. It either has provided the ITG with the contact information and business hours for those individuals or will do so upon receipt of the first request from the ITG.
- Inland Cellular will respond within 24 hours of receipt of traceback request to inquiries received from the Industry Traceback Group. If a pattern of questionable activity is detected, Inland Cellular will require its customer to remedy the problem and, if effective action is not taken, service to the customer may be suspended and/or terminated.

Cooperation with State and Federal Regulators

Inland Cellular will cooperate with state and federal regulators to prevent any and all illegal robocalls. Specifically, Inland Cellular 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.

Inland Cellular has deployed call authentication, call labeling, and call blocking services provided by TNS. We have made great strides to protect our networks and consumers from harmful calls. Inland Cellular is pleased to play a role in that improvement and will continue the necessary work to protect our customers.