

Poka Lambro Telephone Cooperative, Inc. ROBOCALL MITIGATION PLAN

Poka Lambro Telephone Cooperative, Inc. (“Poka Lambro”), Operating Company Number (2131), has completed STIR SHAKEN implementation for traffic that originates on its network.

In addition, the majority of the traffic that terminates to Poka Lambro routes over the IP-portions of Poka Lambro’s network with the exception of traffic terminating from the incumbent carriers. Those connections are still non-IP and rely on technology that cannot initiate, maintain, carry, process, or terminate SIP calls.

Consistent with § 64.6303 (a)(1), Poka Lambro 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. Poka Lambro has contacted the incumbent carriers and requested to convert the Non-IP connections to IP connections. The carriers stated they cannot support IP connections at this time.

For the originating traffic on its network, Poka Lambro has contracted with Alianza to provide its outbound traffic routing. All outbound Poka Lambro calls originate from the Alianza switch. Alianza sign all of the originating calls. Alianza has registered with the Policy Administrator and is an authorized service provider in the STIR|SHAKEN ecosystem.

Robocall Mitigation Plan

All voice traffic that originates on (Poka Lambro’s network is subject to the following Robocall Mitigation Plan.

Call Analytics

All Poka Lambro outbound calls originate from Alianza’s switch and are subject to Alianza’s RMP solution. Alianza provides analytics on outbound calls.

Investigation & Enforcement

Poka Lambro investigates calls identified by Alianza as originators of prohibited unlawful robocalls and may suspend or disable the accounts.

Know your Customer

Poka Lambro has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Poka Lambro 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. Poka Lambro also requires a photo ID for all new customers requesting voice service.

Upstream Provider Knowledge

Poka Lambro knows all the carriers from which it receives traffic and has confirmed that all its connected carriers are listed in the Robocall Mitigation Database.

Poka Lambro has reviewed the connected carrier's RMPs to learn how the carriers monitor their originating traffic to mitigation illegal robocalls.

Poka Lambro is now incorporating traceback and prohibited traffic language in all contractual agreements with upstream carriers.

Role In the Call Chain

Poka Lambro is a voice service provider with a STIR/SHAKEN implementation obligation on the IP-Portions of its network which originates calls.

Poka Lambro is also a voice service provider without a STIR/SHAKEN obligation on the Non-IP portions of its network that terminates calls because portions of Poka Lambro's terminating side of the network relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

Traceback

Poka Lambro 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. Poka Lambro 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.

Robocall Mitigation Database Eligibility

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

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