

MID-PLAINS RURAL TELEPHONE COOPERATIVE ROBOCALL MITIGATION PLAN

Mid-Plains Rural Telephone Cooperative (Mid-Plains), Operating Company Number 2112, 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).

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

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

Robocall Mitigation Plan

All voice traffic that originates on the Mid-Plains network is subject to the following Robocall Mitigation Plan.

Call Analytics

Mid-Plains has contracted with JSI, LLC for Robocall Origination Detection Service. JSI downloads Mid-Plains' CDRs and look for patterns indicative of originating robocalls. JSI emails Mid-Plains a report identifying any detected suspicious call activity.

Investigation

Mid-Plains will examine the suspicious call activity reports generated by JSI LLC and investigate and identify the source of the calls as unlawful or legitimate.

Enforcement

Illegal robocalls and fraudulent spoofing is prohibited on our network. If it is determined a Mid-Plains customer is originating prohibited unlawful robocalls on our network, Mid-Plains will either warn the customer to stop or terminate their service as allowed per Mid-Plains' policies that define the circumstances by which Mid-Plains will suspend or terminate service to a customer.

Know your Customer

Mid-Plains has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Mid-Plains 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.

Upstream Provider Knowledge

Mid-Plains knows all the carriers from which it receives traffic and has confirmed that all of the carriers are listed in the Robocall Mitigation Database. Mid-Plains has also reviewed the connected carrier's RMPs to learn how the carriers monitor their originating traffic to mitigate illegal robocalls. In addition, Mid-Plains is now incorporating traceback and prohibited traffic language in all contractual agreements with upstream carriers.

Role In the Call Chain

Mid-Plains is a voice service provider with a STIR/SHAKEN implementation obligation on the IP-Portions of its network. Mid-Plains is also a voice service provider without a STIR/SHAKEN obligation on the Non-IP portions of its network because that portion of the network relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

Traceback

Mid-Plains 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.

Robocall Mitigation Database Eligibility

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

Mid-Plains has not been prohibited from filing in the Robocall Mitigation Database (RMD).

Customer Education

Mid-Plains 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.