

Mountain Rural Telephone Cooperative Corporation, Inc. Robocall Mitigation Compliance with TRACED Act

Date	Author/Title	Change Summary
February 18, 2026	Travis Keeton, PE Inside Plant Engineer	Update to include Call Guardian

This response is submitted on behalf of Mountain Rural Telephone Cooperative Corporation, Inc. (“MRTC”) and incumbent local service provider in the state of Kentucky.

I. Implementation and Extension Status

Extensions Received Under 47 C.F.R. §64.6304

MRTC 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).

MRTC is a member of NTCA who participates on the ATIS Non-IP taskforce working group which developed the (ATIS Solutions) non-IP call authentication solutions and serves as MRTC’s third-party representative on the ATIS Non-IP taskforce working group.

MRTC will implement a call authentication protocol for voice calls delivered over the non-IP portions of its network that do not use SIP technology when such a protocol is fully developed and finalized by industry standards and the necessary equipment and software is available on the commercial market.

MRTC has implemented authentication and verification of its traffic using the Metaswitch Call Guardian QCall STIR/SHAKEN Signing service for traffic that originates and terminates on the IP portions of the company’s network that support SIP calls.

II. Robocall Mitigation Plan

MRTC is a voice service provider and all calls that originate on its network are subject to the company’s robocall mitigation plan. MRTC uses Call Analytics and Know Your Customer to prevent the origination of robocall traffic on its network. All carriers to which MRTC are connected appear on the Robocall Mitigation Database and their traffic is subject to the same mitigation plan as that of its own end users.

Analytics

MRTC uses TNS Call Guardian analytics technologies and services to monitor traffic on its network and identify potentially unlawful call origination activity. If MRTC 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, MRTC can suspend and/or terminate service to the customer.

MRTC also blocks the following types of calls by default:

- Calls originating from invalid numbers
- Calls from DNO (Do Not Originate) numbers.

Know Your Customer

MRTC utilizes the mitigation technique of “Know Your Customer.” MRTC is a small rural telephone cooperative serving 10K predominantly residential voice subscribers. Its customers are generally “mom and pop” users and few of its total customers have more than twenty lines.

MRTC has set a call path level based on its average customer size. The level – referred to as “large volume calling capability” – is subject to change.

MRTC has a screening for new customers requesting service at or above large volume calling capability levels:

- We will not deploy large volume calling capability as a residential service or at an address shown in the company records as being residential
- Business requesting large volume calling capability must provide a tax ID and verification as to the nature of the business
- A MRTC representative may visit the premise of the business to verify the number of users at the location is appropriate for the volume of calling
- We specifically address with large volume customers that our Terms of Service and/or Acceptable Use Policy include robocalling language that allows MRTC to investigate / suspend / or terminate service to customers engaged in robocalling and to share calling information about the customer should we receive a complaint of robocalling.

MRTC provides a subscription-based, non-commercial legal robocalling product and has directly contacted those subscribers (which include churches, school systems) to educate them about legal versus illegal robocalling activities to insure they continue to remain compliant in their use of the product.

General Prohibition Against Illegal Robocalling

MRTC end user services are subject to restrictions contained in its Terms of Service (“TOS”). End users who purchase services are required to sign an application that includes confirmation of compliance with the TOS, including any revisions that may be implemented upon notice.

The TOS specifically prohibits activities normally associated with robocalling including, but not limited to:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable local, state, or federal law; using the MRTC service to engage in or in connection with fraudulent activities.

Its end users are notified that MRTC may take action up to suspension or termination of service for violation of the TOS.

III. Traceback

MRTC will actively participate the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG). MRTC commitments to respond within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium and will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

IV. Additional Certifications

Neither MRTC nor any entity which shares common ownership, management, directors, or control has been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

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